

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**Honeywell International Inc., Hand Held  
Products, Inc., Metrologic Instruments,  
Inc., Vocollect, Inc., and Intermec IP  
Corp.,**

**Plaintiffs,**

**v.**

**Zebra Technologies Corporation,  
Defendant.**

Civil Action No. 6:22-cv-519

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs Honeywell International Inc. (“Honeywell International”), Hand Held Products, Inc. (“Hand Held”), Metrologic Instruments, Inc. (“Metrologic”), Vocollect, Inc. (“Vocollect”), and Intermec IP Corp. (“Intermec IP”) (collectively, “Honeywell”) file this Complaint for patent infringement against Defendant Zebra Technologies Corporation (“Zebra”). In support of this action, Honeywell alleges the following:

**INTRODUCTION**

1. This action for damages and injunctive relief arises under the Patent Laws of the United States, 35 U.S.C. § 271, *et seq.*

**THE PARTIES**

2. Plaintiff Honeywell International is a Delaware corporation with its principal place of business at 855 S. Mint Street, Charlotte, NC 28202.

3. Plaintiff Hand Held is a Delaware corporation with its principal place of business at 855 S. Mint Street, Charlotte, NC 28202. Hand Held is a wholly-owned and controlled subsidiary of Honeywell International.

**4.** Plaintiff Metrologic is a New Jersey corporation with its principal place of business at 855 S. Mint Street, Charlotte, NC 28202. Metrologic is a wholly-owned and controlled subsidiary of Honeywell International.

**5.** Plaintiff Vocollect is a Pennsylvania corporation with its principal place of business located at 855 S. Mint Street, Charlotte, NC 28202. Vocollect is a wholly-owned subsidiary of Intermec Inc., a Delaware corporation, which is a wholly-owned subsidiary of Hand Held.

**6.** Plaintiff Intermec IP is a Delaware corporation with its principal place of business located at 855 S. Mint Street, Charlotte, NC 28202. Intermec IP is a wholly-owned subsidiary of Intermec Technologies Corp., a Washington corporation, which is a wholly-owned subsidiary of Intermec, Inc. Accordingly, Plaintiffs are collectively referred to herein as "Honeywell."

**7.** On information and belief, Defendant Zebra Technologies Corporation is a Delaware corporation with its principal place of business at 3 Overlook Point, Lincolnshire, IL 60069.

#### **JURISDICTION AND VENUE**

**8.** The Court has federal question jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action involves a claim arising under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*

**9.** The Court has personal jurisdiction over Zebra because Zebra has regularly and systematically transacted business in and with the residents of this judicial district, including maintaining at least one physical office in this district at 507 E Howard Lane, Bldg 1, Austin, Texas 78753. On information and belief, Zebra invested more than \$2 million to construct its Austin office, which occupies more than 26,000 square feet.

**10.** On information and belief, Zebra employs a variety of personnel at its Austin location, including individuals with roles in strategy and innovation; engineering; manufacturing; sales; product management; software, electrical, and mechanical compliance; business and IT operations; and data science.

**11.** On information and belief, Zebra uses its Austin office to conduct work related to handheld devices, mobile computers, and a range of accessories.

**12.** On information and belief, Zebra's wholly owned subsidiary—Xplore Technologies Corp.—is headquartered in Austin, Texas with numerous Xplore employees living in and around Austin, Texas. Upon information and belief, Xplore Technologies designs and develops certain of the accused mobile computing devices, including at least the accused Rugged Tablets ET80, ET85, ET5-series and L10-series XPad, XSlate, and XBook Windows tablets.

**13.** Venue is proper in this judicial district for Zebra, pursuant to 28 U.S.C. §§ 1400 and 1391(b) and (c), because Zebra has committed acts of infringement in this judicial district—including selling and distributing infringing products—and because Zebra maintains a regular and established place of business in this judicial district—including its 26,000 square ft. office in Austin, Texas.

#### **THE PATENTS-IN-SUIT**

**14.** Honeywell accuses Zebra of infringing U.S. Patent Nos. 7,609,669 (“the ’669 patent”), 7,885,419 (“the ’419 patent”), 8,237,563 (“the ’563 patent”), 8,844,822 (“the ’822 patent”), 9,342,724 (“the ’724 patent”), 9,507,976 (“the ’976 patent”), 10,134,120 (“the ’120 patent”), and 6,680,834 (“the ’834 patent”) (collectively, the “Asserted Patents”).

**15.** The ’669 patent, titled “Voice Directed System and Method Configured for Assured Messaging to Multiple Recipients,” issued on October 27, 2009. Lawrence R. Sweeney, James D.

Maloy, Claudine Astorri, and Linda Boyle are the joint inventors of the '669 patent. A true and correct copy of the '669 patent is attached as Exhibit A.

**16.** The '419 patent, titled "Headset Terminal with Speech Functionality," issued on February 8, 2011. James Wahl, Andres Viduya, Ben Kessing, Roger Graham Byford, James Randall Logan, Dominic Tooze, Philip Shade, and Graham Lacy are joint inventors of the '419 patent. A true and correct copy of the '419 patent is attached as Exhibit B.

**17.** The '563 patent, titled "Utilization of Motion and Spatial Identification in Mobile RFID Interrogator," issued on August 7, 2012. Steven V. Schatz, Gary Spiess, Thaddeus Ternes, Maury Anderson, and Hunter Leland are joint inventors of the '563 patent. A true and correct copy of the '563 patent is attached as Exhibit C.

**18.** The '822 patent, titled "Image Capture and Processing System Supporting a Multi-Tier Modular Software Architecture," issued on September 30, 2014. Anatoly Kotlarsky and Xiaoxun Zhu are joint inventors of the '822 patent. A true and correct copy of the '822 patent is attached as Exhibit D.

**19.** The '724 patent, titled "Variable Depth of Field Barcode Scanner," issued on May 17, 2016. Scott McCloskey and Matthew Edward Lewis Jungwirth are joint inventors of the '724 patent. A true and correct copy of the '724 patent is attached as Exhibit E.

**20.** The '976 patent, titled "Encoded Information Reading Terminal with Item Locate Functionality," issued on November 29, 2016. Taylor Smith and Huyu Qu are joint inventors of the '976 patent. A true and correct copy of the '976 patent is attached as Exhibit F.

**21.** The '120 patent, titled "Image-Stitching for Dimensioning," issued on November 20, 2018. Brian L. Jovanovski and Jingquan Li are joint inventors of the '120 patent. A true and correct copy of the '120 patent is attached as Exhibit G.

**22.** The '834 patent, titles "Apparatus and Method for Controlling LED Arrays," issued on January 20, 2004. Marion S. Williams is the sole inventor of the '834 patent. A true and correct copy of the '834 patent is attached as Exhibit H.

**23.** Each Asserted Patent is presumed valid after receiving a thorough examination by the USPTO. *See* 35 U.S.C. § 282.

**24.** The Asserted Patents are a reflection of Honeywell's innovations, and, as described herein, all contain limitations that, either individually or collectively, are directed to inventive concepts that were unconventional and not well known or routine. These inventive concepts, as set forth and claimed in the Asserted Patents, have resulted in immense commercial success of the claimed inventions and the long felt but unsolved needs Honeywell filled with the claimed inventions. In recognition of the innovative nature of the inventions disclosed and claimed in the Asserted Patents, competitors in the relevant industry have sought and obtained licenses to these patents.

**25.** Honeywell provided Zebra with notice of the Asserted Patents in accordance with 35 U.S.C. § 287. For example, Honeywell provided Zebra with constructive notice of the Asserted Patents by virtually marking its patent-practicing products in a substantially consistent and continuous manner. *See* <https://sps.honeywell.com/us/en/support/productivity/patents>.

## **BACKGROUND**

### **A. Honeywell**

**26.** Honeywell traces its roots to 1904 and an engineer named Mark Honeywell from Wabash, Indiana who developed and installed the first hot-water-heating system in the United States. Honeywell would later play a key role in U.S. war efforts, inventing and manufacturing the first electronic autopilot system. After entering the computer business through a merger with

Raytheon Corporation in 1957, Honeywell developed and engineered the instruments that safely landed Neil Armstrong and Buzz Aldrin on the moon.

**27.** Research is one of the keys to Honeywell's success and provides the necessary cornerstone for its cutting-edge products. As a result of its research and development efforts, Honeywell owns over 27,000 patents. These patents cover a wide range of technologies relating to mobile computers, barcode scanners, wearable technology, human interface devices, and various components thereof.

**B. Hand Held**

**28.** Honeywell acquired Hand Held in December 2007. Hand Held now operates as part of Honeywell Safety and Productivity Solutions.

**29.** Hand Held was founded in Charlotte, North Carolina. It provides barcode reading and image collection solutions for a variety of applications including mobile, wireless, and transaction processing. These products include barcode scanners, computer devices, printers, wearable technology, software, and RFID devices. These devices provide innovative solutions for factories, healthcare and manufacturing facilities, and retail environments. As a result of Hand Held's innovative designs and product features, its products have become commonplace in hospitals and other healthcare facilities because of their reliability, accuracy, and versatility.

**30.** Hand Held has long been a pioneer in barcode scanning technology. For example, Hand Held developed ground-breaking global-shutter technology in CMOS-based barcode scanners. The global shutter technique allows a barcode scanner to capture all lines of the barcode simultaneously, instead of just one by one. Products incorporating Honeywell's patented global shutter technique were—and still are—far superior to scan engines utilizing a rolling shutter, resulting in significant commercial success for Honeywell's global-shutter products.

**31.** As a result of its research and development efforts, Hand Held owns about 1,900 patents. These patents cover a wide range of technologies relating to mobile computers, barcode scanners, wearable technology, human interface devices, and various components thereof.

**C. Metrologic**

**32.** Honeywell acquired Metrologic in July 2008. Metrologic operates alongside Hand Held as part of Honeywell Safety and Productivity Solutions.

**33.** Metrologic was founded in 1968 and developed the first hand-held laser barcode scanner, known as the X-scanner, in the 1970s. Metrologic is an industry leader in data capture and collection hardware and software. During the birth of the Universal Product Code, Metrologic introduced triggerless, omnidirectional, and mini-slot scanners into the retail market to help read and decode these new barcodes. Since these breakthroughs, Metrologic's technologies have included barcode computing, software for barcode scanners optimization, and wireless communication network infrastructure.

**34.** As a result of its research and development efforts, Metrologic owns about 300 patents. These patents cover a wide variety of technologies in the areas of laser and imaging technologies.

**D. Vocollect**

**35.** Intermec Inc. acquired Vocollect in January, 2011. Intermec Inc. was thereafter acquired by Honeywell International in 2013.

**36.** Vocollect was founded in 1987 and is an industry leading provider of voice-centric solutions for mobile workers worldwide. As an indirect subsidiary of Hand Held, Vocollect operates as part of Honeywell Safety and Productivity Solutions.

**E. Intermec IP**

**37.** Intermec IP operates as an indirect subsidiary of Intermec Inc., a manufacturer and supplier of automated identification and data capture equipment, including barcode scanners, barcode printers, mobile computers, RFID systems, voice recognition systems, and live cycle services. Intermec IP operates as part of Honeywell Safety and Productivity Solutions.

**ZEBRA'S INFRINGING ACTIVITIES**

**38.** Zebra is a direct competitor of Honeywell.

**39.** Zebra has infringed and continues to infringe on Honeywell's valuable and proprietary intellectual property, including at least the Asserted Patents. Zebra is using Honeywell's patented technology without a license or Honeywell's permission.

**40.** Zebra manufactures, sells, and offers for sale products and services related to Barcode Printing, Mobile Computing, Data Capture, Locationing, Data Platforms, Software, Services, and Supplies.

**41.** Zebra had actual knowledge of all Asserted Patents and of Honeywell's infringement allegations at least as early as the filing of this Complaint.

**42.** Zebra's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Zebra.

**43.** Upon information and belief, Zebra has actively monitored Honeywell's patent-marked products since as early as 2015 as part of its ordinary course of business.

**44.** Zebra's infringing barcode readers and mobile computing products include at least Zebra's TC72 and TC77, and the ET80, ET85, ET5-series, L10-series XPad, XSLate, and XBook Windows tablets (collectively, Zebra's "Infringing Mobile Computers").

**45.** Zebra's infringing RFID Readers and RFID Positioning products include at least the RFD8500i, RFD90, RFD40, SmartLens System and components (e.g., SNAP SmartLens Sensor), and MotionWorks Sport Player Tracking software and related accessories (Zebra's "Infringing RFID Readers and RFID Tracking products").

**46.** Zebra's infringing Speech / Picking systems include at least the WT6000 Wearable Voice-Directed Workflow Solutions system (Zebra's "Infringing Speech / Picking systems").

**47.** Zebra's infringing headsets include at least the HS2100 and HS3100 (Zebra's "Infringing Headsets").

**48.** Zebra's infringing 3D Profile Sensors include at least the Matrox Altiz (Zebra's "Infringing 3D Profile Sensors").

**49.** Zebra's infringing Matrox Iris GTR smart camera and accessories for the Matrox Iris GTR smart camera include at least Matrox Iris GTX, Matrox Imaging software, including MIL-X, MIL-Lite-X and the Matrox Imaging Library X software development kit (Zebra's "Infringing Matrox Camera and Accessories").

**50.** Zebra's Infringing Mobile Computers, Infringing RFID Readers and RFID Tracking products, Infringing Speech / Picking systems, Infringing Headsets, Infringing 3D Profile Sensors, and Infringing Matrox Camera and Accessories are collectively the "Accused Products."

**51.** Zebra makes, uses, sells, and/or offers for sale within the United States, and imports into the United States, the Accused Products without a license or authority from Honeywell.

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 7,609,669**

**52.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

**53.** The '669 patent is valid and enforceable.

**54.** Vocollect owns the entire right, title, and interest to the '669 patent.

**55.** Zebra has directly infringed and continues to directly infringe at least claim 1 of the '669 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '669 patent, including Zebra's Wearable Voice-Directed Workflow Solutions System.

**56.** As shown below, Zebra's Wearable Voice-Directed Workflow Solutions System, with specific reference to, for example, the WT6000 Wearable Computer and HS3100/HS2100 Rugged Headset (collectively the '669 Patent Accused Products"), practices a method for sending a message to a set of selected operators performing logistical operations at a warehouse.

**57.** The '669 Patent Accused Products operate such that the WT6000 Wearable Computer communicates wirelessly with a server at a warehouse for receiving text messaged instructions intended for an operator performing logistical operations at the warehouse. The system then converts the text messages into voice messages which are played for the user via the HS3100/HS2100 Rugged Headset. The user speaks their response into the HS3100/HS2100 Rugged Headset, which is then communicated back to the server, via the WT6000 Wearable Computer.

**58.** The '669 Patent Accused Products execute a logistical application on at least one wireless terminal that is communicating with a server over a wireless network within the warehouse.

**59.** The '669 Patent Accused Products include the WT6000 Wearable Computer executing a logistical application within a warehouse:

**BUILD YOUR SOLUTION WITH THESE COMPONENTS**

**HARDWARE**

Our handheld and wearable mobile computers, paired with Zebra and partner software, are purpose-built to provide enterprise-level support for your multi-modal and voice-directed picking needs.

Handheld Mobile Computers  
WT6000 Wearable Computer  
RS6000 Bluetooth Ring Scanner  
RS4000 Corded Ring Scanner  
HS3100/2100 Rugged Headset

**SOLUTIONS THAT PICK UP THE PACE**

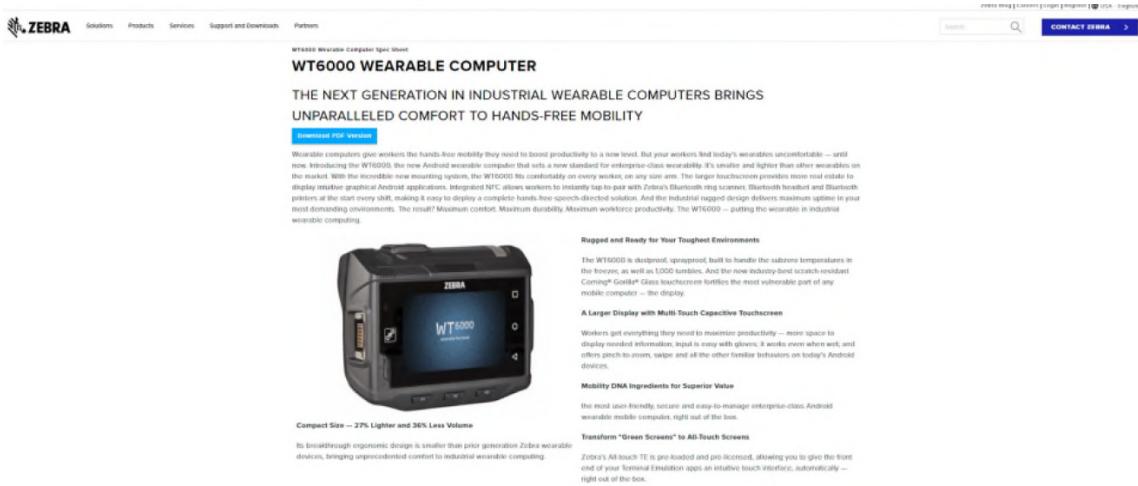
Whether you have a distribution centre that specialises in high velocity picking or a warehouse full of pallets and cases, Zebra picking solutions allow you to experience both speed and accuracy in either situation. Accuracy is essential to ensure consumer safety and satisfaction, as well as inventory and materials management. Using the power of voice, scanning, and visual cues, workers can perform hands-free tasks and dramatically increase speed, without sacrificing accuracy.

**Logistical application being executed**

PERFORMANCE CHARACTERISTICS		Speech Directed Picking
Processor	Quad-Core 1GHz processor	TelSpeech Pro 4 Certified; compatible with 3rd party VDP clients
Operating System	Android Lollipop 5.1 with Mobility Extensions (ME)	
Memory	4GB Flash (SLC), 1GB RAM	
Data Capture Options	<ul style="list-style-type: none"> <li>* SE965 1D standard range scan engine supported peripheral module RS4000</li> <li>* SE4750-SR or MR; standard or medium range next generation omni-directional 1D/2D Imaging engine supported peripheral module RS6000</li> <li>* SE4500-SR or DL; Standard or Driver's License omni-directional 1D/2D Imaging engine supported peripheral module RS500</li> </ul>	<b>ENTERPRISE SOFTWARE</b> <ul style="list-style-type: none"> <li>Applications PTT Express Client; All-touch Terminal Emulation (TE)</li> <li>Staging/MDM SOTI MobiScan; Airwatch; StageNow</li> <li>Tools App Gallery; Enterprise Browser; Enterprise Diagnostic (EDM)</li> <li>Development EDMK available through Zebra Support Central Web site</li> <li>Data Capture DataWedge</li> <li>Utilities Diagnostics – RSLogger; Enterprise Home Screen</li> </ul> <b>MOBILITY DNA SOLUTIONS</b>

## Logistical application being executed

60. The WT6000 Wearable Computer, shown below, is a wireless terminal on which the logistical application is run:



61. The WT6000 communicates wireless over a local area network (“LAN”) via a server. As shown below, the WT6000 is configured for wireless LAN radio communications via the IEEE 802.11a/b/g/n/ac standard, a well-known Wi-Fi standard for wireless communication over LANs:

Wireless Data Communications	
Bluetooth	Bluetooth 4.1 (Bluetooth Smart technology); Class 1 and Class 2
NFC	Multiprotocol NFC reader
Wireless LAN Radio	IEEE 802.11a/b/g/n/ac
Data Rates	5GHz: 802.11a/n — up to 135 Mbps; 802.11ac — Single-stream and dual-stream solution with data rates up to 433.3 and 866.7 Mbps 2.4GHz: 802.11b/g/n — up to 72.2 Mbps (one stream) 144.4 Mbps (dual stream)

Subject to the terms of Zebra's hardware warranty statement, the WT6000 is warranted against defects in workmanship and materials for a period of 1 (one) year from the date of shipment. For complete warranty statement, please visit:  
<http://www.zebra.com/warranty>

**Recommended Services**

Zebra OneCare

\* Multi-modal Picking Usability Testing - E-Commerce; United States Ergonomics; July 31, 2015

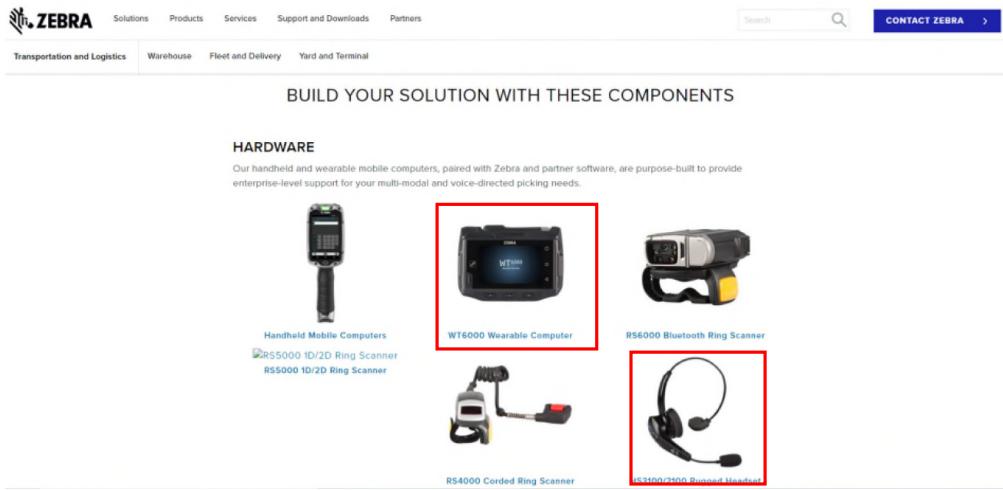
**62.** The WT 6000 receives a textual message transmitted from the server:

Zebra's wearable portfolio offers:	Application	Benefits
<ul style="list-style-type: none"> <li>• Most extensive wearable line in the industry</li> <li>• The most advanced mobile computing, scanning and voice technology</li> <li>• Award-winning wearable ergonomics for all-day comfort</li> <li>• Rugged construction for the warehouse</li> <li>• High-performance computing platforms</li> <li>• High-speed 802.11a/b/g/n wireless connectivity</li> </ul>	Picking	<ul style="list-style-type: none"> <li>• Increases productivity: allows the same staff to pick more orders per day</li> <li>• Increases accuracy for error-free fulfillment</li> </ul>
	Voice-based picking	<ul style="list-style-type: none"> <li>• Improves picking speed and accuracy</li> </ul>
	Put-away Let-down	<ul style="list-style-type: none"> <li>• Improves productivity</li> <li>• Increases inventory accuracy: the right products are in the right location</li> </ul>
	Packing	<ul style="list-style-type: none"> <li>• Increases productivity: allows the same staff to pack more orders per day</li> <li>• Increases shipping accuracy and customer satisfaction</li> </ul>
	Shipping and receiving	<ul style="list-style-type: none"> <li>• Improves productivity</li> <li>• Improves shipping and delivery times</li> </ul>
<ul style="list-style-type: none"> <li>• Flexible application support: voice-only, text-only and voice and text</li> </ul>		
<ul style="list-style-type: none"> <li>• Enterprise manageability and support</li> </ul>		

**63.** As explained above, the WT6000 is configured for wireless LAN radio communications via the IEEE 802.11a/b/g/n/ac standard. Thus, the WT6000 must be communicating wirelessly over the LAN with a server or another computer and that server or other computer must be the source of the received textual message.

**64.** The '669 Patent Accused Products output the received textual message as audio output with a speaker that is in communication with the at least one wireless terminal.

**65.** The WT6000 Wearable Computer outputs textual messages as audio output with a speaker built into the HS3100/HS2100 Rugged Headset which is in communication with the WT6000 Wearable Computer. Zebra's marketing materials explain that the WT6000 Wearable Computer and the HS3100/HS2100 Rugged Headset communicate with each other as part of its "Solution:"



66. Zebra's HS3100/HS2100 Rugged Headsets "can work with all Zebra devices running speech recognition and text-to-speech engines for speech directed applications."

## HS3100/HS2100 Specifications

### PERFORMANCE CHARACTERISTICS

Speech-Directed Applications	Can work with all Zebra devices running speech recognition and text-to-speech engines for speech-directed applications
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67. The '669 Patent Accused Products receive a verbal indication from an operator of the wireless terminal that the textual message audio output was at least one of accessed and understood by the operator.

68. Zebra marketing materials state, at [https://www.youtube.com/watch?v=94-5-R\\_JRlc](https://www.youtube.com/watch?v=94-5-R_JRlc), "you are confirming via voice" receipt of the textual message audio output via the HS3100/HS2100 Rugged Headset:



**69.** Upon information and belief, the '669 Patent Accused Products transmit an acknowledgement message to the server from the terminal that the verbal indication was received from the operator. The reason for the acknowledgement message is to inform the server that the message sent to the operator was received by the user. This acknowledgement allows the server to send another message to the user. Without such an acknowledgement, the server would not know whether the user is ready to execute a next message.

**70.** Zebra also indirectly infringes and continues to indirectly infringe at least claim 1 of the '669 patent with knowledge or by being willfully blind that its actions constitute infringement, at least as of the filing of this Complaint.

**71.** Zebra has induced and continues to induce infringement of the '669 patent by providing information and instruction on using the '669 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities, (ii) the instructions and

information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**72.** Zebra contributes to infringement of the '669 patent by others by manufacturing, marketing, and selling the '669 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**73.** Despite its knowledge of the '669 patent, Zebra infringed and continues to infringe that patent. Accordingly, Zebra's infringement has been willful.

**74.** As a result of Zebra's infringement of the '669 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**75.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**76.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT I**  
**INFRINGEMENT OF U.S. PATENT NO. 7,885,419**

**77.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

**78.** The '419 patent is valid and enforceable.

**79.** Vocollect owns the entire right, title, and interest to the '419 patent.

80. Zebra has directly infringed and continues to directly infringe at least claim 1 of the '419 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '419 patent, including, for example, Zebra's HS2100/HS3100 headsets (“the '419 Patent Accused Products”).

81. Zebra's HS2100/HS3100 are headsets.

82. The HS3100 User Guide shows the HS3100 headset:

#### Over-the-Head (OTH) Features

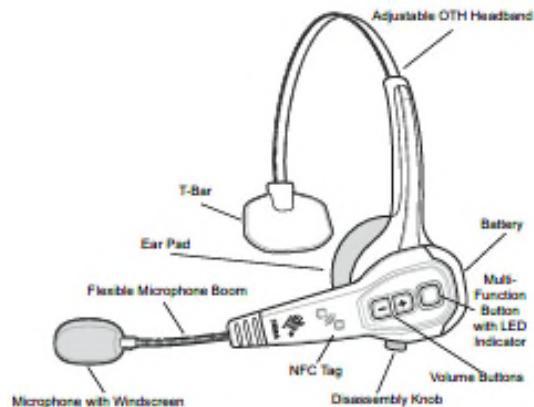


Figure 1-1 HS3100-OTH Bluetooth Headset

83. The HS2100/HS3100 EMC Configuration and Accessories Guide shows the HS2100 and HS3100 headsets:

#### Headset Models



HS2100 Corded Headset



HS3100 Bluetooth Headset

84. The '419 Patent Accused Products include a headband assembly for spanning across the head of a user. For example, the HS3100 User Guide, which shows the HS3100 headset:

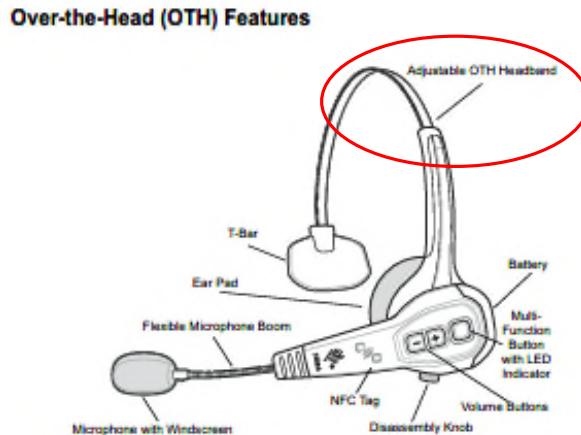


Figure 1-1 HS3100-OTH Bluetooth Headset

Page 1-3.

85. The '419 Patent Accused Products include an earcup assembly coupled proximate one end of the headband assembly and including: a speaker for playing audio speech signals to a user.

86. The HS3100 User Guide shows the HS3100's earcup assembly proximate one end of the headband assembly:

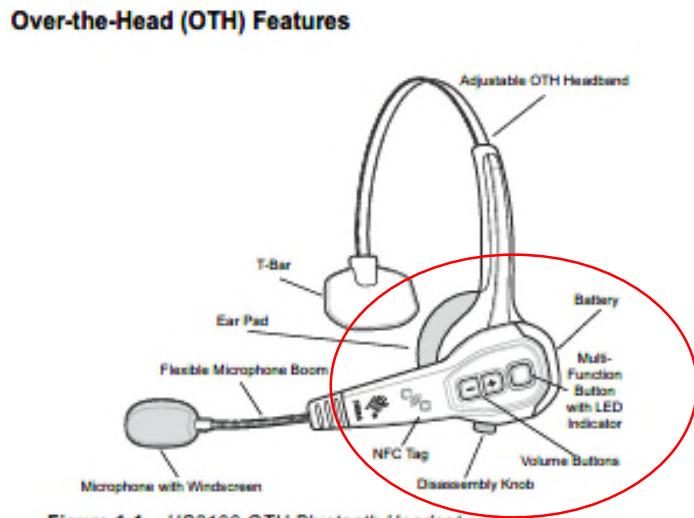


Figure 1-1 HS3100-OTH Bluetooth Headset

87. The HS3100's earcup assembly has a speaker for playing audio speech signals to a user:

**Table B-1 HS3100 Bluetooth Headset Technical Specifications (Continued)**

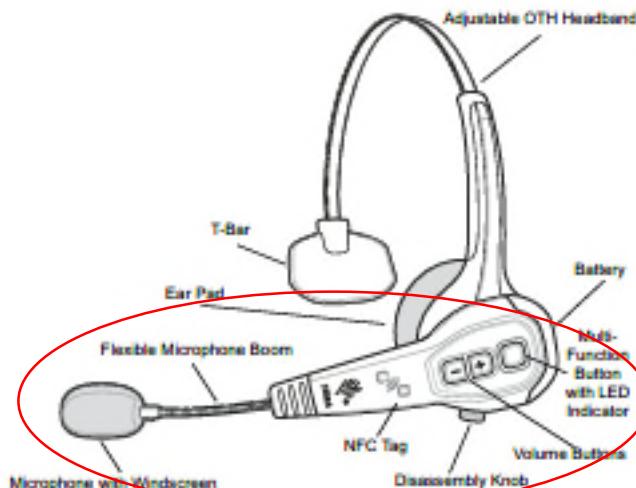
Item	Description
Receive Frequency Response	300 Hz to 6 kHz
Speaker Sensitivity	89 dB SPL with 1.0 Vrms @ 1 kHz
Bluetooth	Bluetooth Class II, v 3.0; Bluetooth Hands-free Profile (HFP 1.6)
NFC	NFC tag used for Tap-to-Pair

HS3100 User Guide, Table B-1.

88. The '419 Patent Accused Products include a microphone boom assembly including a microphone for capturing speech of a user, the microphone boom assembly rotatably coupled in the earcup assembly to rotate on a generally horizontal axis.

89. The HS3100 User Guide, for example, shows the HS3100 microphone boom assembly and microphone:

#### Over-the-Head (OTH) Features



**Figure 1-1 HS3100-OTH Bluetooth Headset**

90. The HS3100/HA2100 Rugged Headsets Product Spec Sheet describes capturing speech of a user:

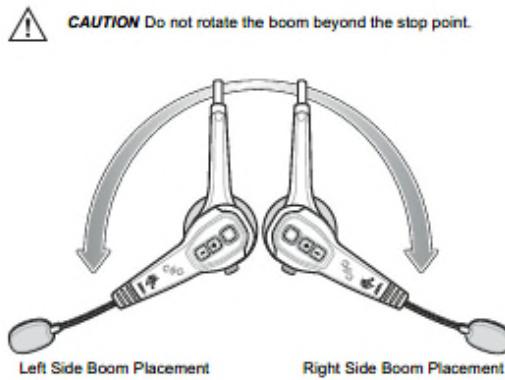
PERFORMANCE CHARACTERISTICS	
Speech-Directed Applications	Can work with all Zebra devices running speech recognition and text-to-speech engines for speech-directed applications
Audio	High performance sealed noise canceling microphone with noise immunity greater than 10 dB for high noise environments
Send Frequency Response	50 Hz to 8 kHz
Microphone Sensitivity	-53dB @ 1kHz, 1Pa

91. The rotation of the microphone boom assembly is shown, for example, in Figure 3-1 of the HS3100 User Guide:

### Position the Boom

To position the boom:

Rotate the boom for left side or right side placement.



**Figure 3-1 Position the Boom**

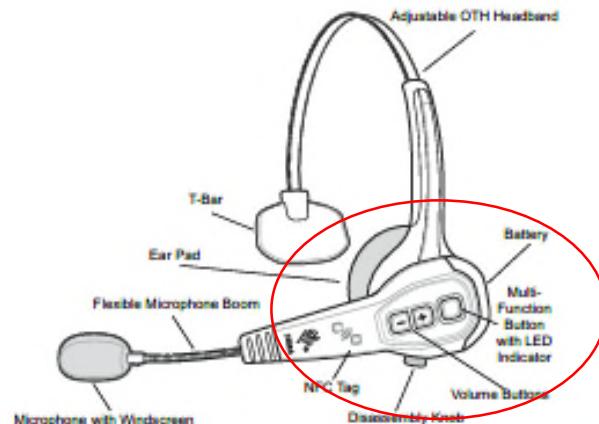
✓ **NOTE** Applies to OTH model. The BTN model has only left side boom placement.

92. The '419 Accused Products include controls mounted on the microphone boom assembly to rotate with the assembly, the controls including elements mounted on opposite sides

of the axis that maintain a consistent orientation on the boom assembly with respect to the head of a user when it is rotated in either direction.

**93.** The HS3100 User Guide, for example, shows the controls mounted on the microphone boom assembly. As can be seen in the image, there are elements (e.g., volume buttons and multi-function button with LED indicator) mounted on opposite sides of the axis that maintain a consistent orientation on the boom assembly with respect to the head of a user when it is rotated in either direction:

**Over-the-Head (OTH) Features**



**Figure 1-1 HS3100-OTH Bluetooth Headset**

**Page 1-3.**

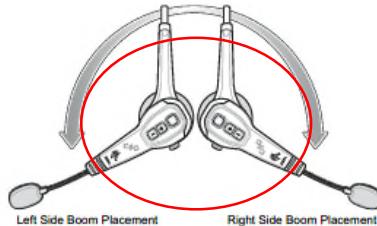
**94.** Figure 3-1 of the HS3100 User Guide also shows the controls mounted on the microphone boom assembly. As can be seen in the image, there are elements (e.g., volume buttons and multi-function button with LED indicator) mounted on opposite sides of the axis that maintain a consistent orientation on the boom assembly with respect to the head of a user when it is rotated in either direction:

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#### Position the Boom

To position the boom:  
Rotate the boom for left side or right side placement.

 **CAUTION** Do not rotate the boom beyond the stop point.



**Figure 3-1 Position the Boom**

 **NOTE** Applies to OTH model. The BTN model has only left side boom placement.

**95.** The headset of the '419 Accused Products may be used on either side of a user's-head.

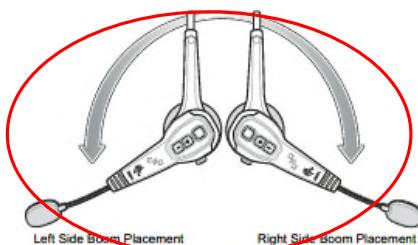
**96.** Figure 3-1 of HS3100 User Guide, for example, shows it may be used on either side of a user's head:

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#### Position the Boom

To position the boom:  
Rotate the boom for left side or right side placement.

 **CAUTION** Do not rotate the boom beyond the stop point.



**Figure 3-1 Position the Boom**

 **NOTE** Applies to OTH model. The BTN model has only left side boom placement.

**97.** Table 1-1 of the HS3100 User Guide, for example, also shows it may be used on either side of a user's head:

## Headset Configurations

**Table 1-1 Headset Configurations**

Model	Configuration	Includes
HS3100-OTH	Over-the-Head Headband Left or Right Side Boom Placement	HS3100 Boom Module OTH Headband Windscreens Battery

**98.** The HS3100/HS2100 Rugged Headsets Product Spec Sheet also shows they may be used on either side of a user's head:

### Customizable Wearing Styles

Your users can choose their own wearing style — over-the-head or behind the neck. Since the boom swivels 290°, workers using the over-the-head wearing style can easily switch between the right and left ear at any time. When the boom is swiveled, the headset is automatically muted.

**99.** Zebra also indirectly infringes and continues to indirectly infringe at least claim 1 of the '419 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**100.** On information and belief, Zebra had knowledge of or was willfully blind to the '419 patent before Honeywell filed this suit. For example, Zebra's wholly-owned subsidiary, Symbol Technologies, Inc. ("Symbol") cited the '419 patent as prior art in at least U.S. Patent No. 8,520,860.

**101.** Zebra has induced and continues to induce infringement of the '419 patent by providing information and instruction on using the '419 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and

potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**102.** Zebra contributes to infringement of the '419 patent by others by manufacturing, marketing, and selling the '419 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**103.** Despite its knowledge of the '419 patent, Zebra infringed and continues to infringe the '419 patent. Accordingly, Zebra's infringement was willful.

**104.** As a result of infringement of the '419 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**105.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**106.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT III**  
**INFRINGEMENT OF U.S. PATENT NO. 8,237,563**

**107.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

**108.** The '563 patent is valid and enforceable.

**109.** Intermec IP owns the entire right, title, and interest to the '563 patent.

**110.** Zebra has directly infringed and continues to directly infringe at least claim 15 of the '563 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '563 patent, including, for example, Zebra's Smart Lens product and MotionWorks Sport Player Tracking software and related accessories (“the '563 Patent Accused Products”).

**111.** As shown below, the SmartLens Fact Sheet (at 2) describes the '563 Patent Accused Products as a system for identifying an RFID tag within a defined zone:

### **What It Is...and How It Works**

Zebra SmartLens Gen II for Retail consists of the SmartLens overhead sensors, the SmartLens data analytics engine and SmartLens data. While there are multiple layers in this solution, it is designed to easily integrate into your existing technology architecture and infrastructure.

Different sensors — designed for specific areas of your store — including the backroom, exit/entry points, the sales floor and the Point of Sale (POS) automatically collect data every time inventory moves. The SmartLens Data Analytics engine aggregates and correlates the data collected by the sensors into meaningful business events. SmartLens data can help turn those events into actionable insights that help retailers increase sales, reduce shrink, enable successful omnichannel sales and reduce overall operational costs.

Get your Zebra SmartLens for Retail solution up and running quickly with Zebra's SmartLens data to address some of your most pressing retail issues. With the Zebra SmartLens for Retail open platform, you can also develop custom applications or integrate with existing systems, such as your Warehouse Management System (WMS), Enterprise Resource Planning (ERP) or other line-of-business application.

The result is operational visibility that is truly visionary, providing business intelligence that will drive competitive advantage right into your operations.

**112.** The SmartLens Fact Sheet (at 3) describes the '563 Patent Accused Products as including an RFID reader configured to read an RFID tag:

## **Sensing Network Appliance (SNAP) SmartLens Sensor**

### **Track inventory on the sales floor**

The SNAP SmartLens Sensor is loaded with the technology you need to obtain unprecedented real-time visibility into what is happening on your sales floor. Track the movement of items with the integrated high-performance RFID reader. These overhead sensors are designed to accommodate different store ceiling types and heights. And sensor housings can be customized to complement your store's architecture and aesthetics.

**113.** The SmartLens Fact Sheet (at 3) describes the '563 Patent Accused Products as including means, coupled to the RFID reader, for determining positional data of the RFID tag:

## **The Hardware**

### **SmartLens for Retail sensors**

Four sensors meet the needs of different areas in the store.

### **Transition Point SmartLens Sensor**

#### **Track inventory as it moves through entry/exit points**

When inventory moves through receiving and entry/exit points, you need to know which direction it is traveling to understand where it is headed. The Transition Point SmartLens Sensor does just that, reaching beyond simple presence detection to collect the data required to determine whether items are entering or leaving an area. And with flexible options that enable you to install this sensor on a wall or suspend it from the ceiling, it's easy to deploy the Transition Point SmartLens Sensor in virtually any retail environment.

### **Backroom SmartLens Sensor**

#### **Track inventory in the backroom from the moment it arrives**

This RFID sensor starts the tracking cycle by detecting and recording the movement of RFID-tagged inventory from the moment it enters your backroom to the moment it leaves. This high-performance advanced fixed RFID reader is designed to handle high tag volumes with increased accuracy and read rates. Installation is simple,

and Power-over-Ethernet (PoE) eliminates the need to install power outlets — ideal for typical complex backroom environments. And deployment is simple — just turn on the device and you're up and running.

**Sensing Network Appliance (SNAP)  
SmartLens Sensor**

**Track inventory on the sales floor**

The SNAP SmartLens Sensor is loaded with the technology you need to obtain unprecedented real-time visibility into what is happening on your sales floor. Track the movement of items with the integrated high-performance RFID reader. These overhead sensors are designed to accommodate different store ceiling types and heights. And sensor housings can be customized to complement your store's architecture and aesthetics.

**114.** The SmartLens Fact Sheet (at 3-4) describes the '563 Patent Accused Products as including means, coupled to the means for determining positional data, for determining whether the RFID tag is within a defined space based at least in part on the positional data determined from the means for determining positional data. For example, SmartLens contains “means for determining positional data” by using “Different sensors — designed for specific areas of your store — including the backroom, exit/entry points, the sales floor and the Point of Sale (POS) automatically collect data every time inventory moves.” (Fact Sheet at 2). “The SmartLens Data Analytics engine aggregates and correlates the data collected by the sensors into meaningful business events. SmartLens data can help turn those events into actionable insights that help retailers increase sales, reduce shrink, enable successful omnichannel sales and reduce overall operational costs. (Fact Sheet at 2):

### **Backroom SmartLens Sensor**

#### **Track inventory in the backroom from the moment it arrives**

This RFID sensor starts the tracking cycle by detecting and recording the movement of RFID-tagged inventory from the moment it enters your backroom to the moment it leaves. This high-performance advanced fixed RFID reader is designed to handle high tag volumes with increased accuracy and read rates. Installation is simple,

and Power-over-Ethernet (PoE) eliminates the need to install power outlets — ideal for typical complex backroom environments. And deployment is simple — just turn on the device and you're up and running.

### **SmartLens Loss Prevention**

#### **Prevent theft and shrink to protect your profitability**

Easily prevent shrink of high dollar items with geofencing. With geofencing, you can send alerts on high value items as they move through various departments and areas of your store — for example, you can see when high value items have been carried into a fitting room. The result? No more lost sales since you'll always know where your most valuable items are in the store at any time.

### **The Analytics Engine**

The brains behind the SmartLens solution

#### **SmartLens Data Analytics Engine**

##### **Correlate RFID data into timely and pertinent events**

The SmartLens Data Analytics Engine is at the heart of the SmartLens solution. The engine consists of two components. The SmartLens Appliance Server correlates volumes of raw RFID data to provide meaningful events. Then the sophisticated analytics in the SmartLens Business Analytics and Reporting (BAR) automatically turns those events into actionable insights that can improve practically every aspect of your everyday store operations. You no longer need to spend hours compiling data to examine past performance to determine how to improve future operations. Instead, without lifting a finger, you get a real-time picture that reveals how and where you can improve operations, right now.

**115.** In addition, and as shown below, the Zebra MotionWorks Sport: Real-Time Player Tracking page (<https://www.zebra.com/us/en/solutions/intelligent-edge-solutions/rtls/sports->

player-tracking.html) describes the '563 Patent Accused Products as making up a system for identifying an RFID tag within a defined zone:

## TOTAL VISIBILITY IN SPORTS

Building on the company's rich foundation, Zebra has boldly challenged the status quo in sports by introducing patented RFID technology to deliver a paradigm-shifting, player tracking system in professional sports. Zebra MotionWorks™ Sport enables a trove of data for real-time insight. As its full spectrum of capabilities continues to be leveraged across multiple sports properties, its impact will be significant. New player tracking insights will change how fans relate to sports through cross-channel engagement and forever transform coaching and player personnel evaluations.

### MOTIONWORKS IN THE NFL

For location solutions in the field of sports, Zebra MotionWorks is a proven winner as well. Enabling a trove of data that provides real-time insights, Zebra's player and ball-tracking technology is a legitimate game-changer. It is revolutionizing how staffs evaluate players, transforming the way coaches strategize and game plan.

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**116.** Another Zebra page (<https://www.zebra.com/us/en/blog/posts/2021/why-nfl-players-are-benefiting-from-rfid-technology.html>) shows RFID tags applied to a player's shoulder pads allowing the system to determine "yards after a catch (YAC)" and "YAC over expectation (YACOE)":



**117.** The Built by Data: NFL Helmet Innovation webpage (<https://www.nfl.com/playerhealthandsafety/equipment-and-innovation/engineering-technology/built-by-data-nfl-helmet-innovation>) states that tracking begins "As soon players step out of the locker room and onto the field":

facemask – players are wearing. As soon as players step out of the locker room and onto the field, the tags are activated by radio waves that send data to a central digital inventory management system. This data is collected for every player, for every practice and every game.

"Zebra's RFID tags are attached to players' shoulder pads and in footballs to transmit real-time location data to gather metrics such as player speed, distance traveled, orientation and acceleration," said John Pollard, vice president of business development, Zebra Technologies. "The collaboration between the NFL and Zebra is driving insights that can help keep players safe."

**118.** Materials concerning the Zebra MotionWorks Sport describe the '563 Patent Accused Products as including an RFID reader configured to read an RFID tag.

**119.** For example, according to a Businesswire article (<https://www.businesswire.com/news/home/20210128005157/en/NFL-and-Zebra-Technologies-to-Discuss-Real-Time-Tracking-and-Key-Insights-Leading-into-Super-Bowl>), "To enable the data collection, Zebra attaches RFID tags to player equipment and footballs, transmitting real-time location data to receivers positioned around the stadium that gather metrics such as player speed, distance traveled, orientation and acceleration. During the 2020-21 NFL season, Zebra tagged 2,880 players plus all the officials."

Zebra is now in its seventh year as the Official On-Field Player-Tracking Provider for the NFL. To enable the data collection, Zebra attaches RFID tags to player equipment and footballs, transmitting real-time location data to receivers positioned around the stadium that gather metrics such as player speed, distance traveled, orientation and acceleration. During the 2020-21 NFL season, Zebra tagged 2,880 players plus all the officials.

**120.** Materials concerning the Zebra MotionWorks Sport describe the '563 Patent Accused Products as including means, coupled to the RFID reader, for determining positional data of the RFID tag.

**121.** For example, the MotionWorks Sport "gathers metrics such as player speed, distance traveled, orientation and acceleration" based on "real-time location data":

Zebra is now in its seventh year as the Official On-Field Player-Tracking Provider for the NFL. To enable the data collection, Zebra attaches RFID tags to player equipment and footballs, transmitting real-time location data to receivers positioned around the stadium that gather metrics such as player speed, distance traveled, orientation and acceleration. During the 2020-21 NFL season, Zebra tagged 2,880 players plus all the officials.

<https://www.businesswire.com/news/home/20210128005157/en/NFL-and-Zebra-Technologies-to-Discuss-Real-Time-Tracking-and-Key-Insights-Leading-into-Super-Bowl>.

**122.** The MotionWorks Sport allows tracking of players and the ball:

### **MOTIONWORKS IN THE NFL**

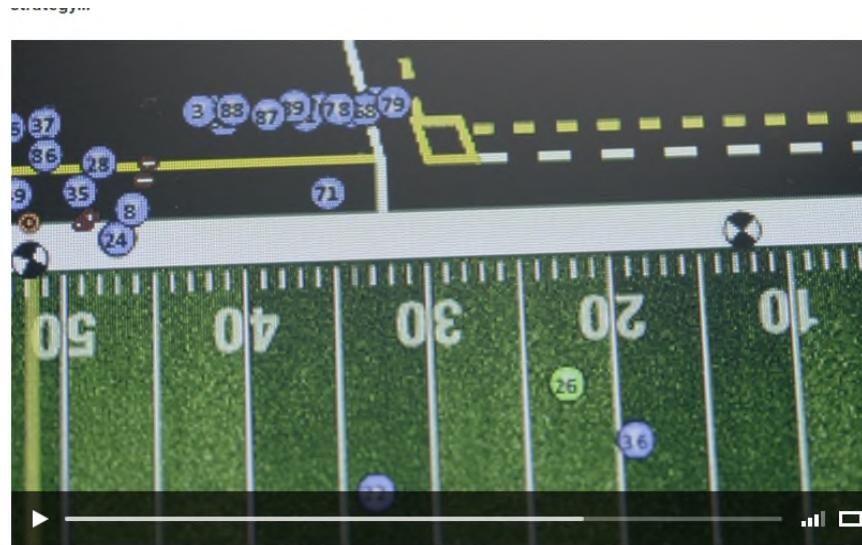
For location solutions in the field of sports, Zebra MotionWorks is a proven winner as well. Enabling a trove of data that provides real-time insights, Zebra's player and ball-tracking technology is a legitimate game-changer. It is revolutionizing how staffs evaluate players, transforming the way coaches strategize and game plan.

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<https://www.zebra.com/us/en/solutions/intelligent-edge-solutions/rtls/sports-player-tracking.html>.

**123.** Materials concerning the Zebra MotionWorks Sport describe the '563 Patent Accused Products as including means, coupled to the means for determining positional data, for determining whether the RFID tag is within a defined space based at least in part on the positional data determined from the means for determining positional data.

**124.** For example, the video hosted on Zebra's Stories from the NFL webpage (<https://www.zebra.com/us/en/blog/posts/2019/stories-from-the-edge-nfl-bets-big-on-rfid-iot.html>) boasts that the system can determine "where's the ball at in relation to a specific player." The same video states that the technology can be used to determine "who's on the field, how often and where they are at."



Whether related to speed, distance, proximity to other players and the ball during any given play or other spor

**125.** As shown below, MotionWorks Sport can be used to track a specific route taken by a player:

#### **Coaching and Training**

Zebra's solution enables a consistent, data-forward analysis method, allowing coaches to strategize in-game and in-practice using real-time data to adapt and be endlessly nimble in play-calling. Whether assessing route running patterns, evaluating grouping and formation, analyzing the separation distances on pass coverage or assessing quarterback pressure, there are limitless, highly customizable applications.

<https://www.zebra.com/us/en/solutions/intelligent-edge-solutions/rtls/sports-player-tracking.html>.

**126.** Zebra also indirectly infringes and continues to indirectly infringe at least claim 15 of the '563 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**127.** On information and belief, Zebra had knowledge of or was willfully blind to the '563 patent before Honeywell filed this suit. For example, Symbol cited the '563 patent as prior art in at least published application US20140285324A1.

**128.** Zebra has induced and continues to induce infringement of the '563 patent by providing information and instruction on using the '563 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**129.** Zebra contributes to infringement of the '563 patent by others by manufacturing, marketing, and selling the '563 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**130.** Despite its knowledge of the '563 patent, Zebra infringed and continues to infringe the '563 patent. Accordingly, Zebra's infringement was willful.

**131.** As a result of Zebra's infringement of the '563 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**132.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**133.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT III**  
**INFRINGEMENT OF U.S. PATENT NO. 8,844,822**

**134.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

**135.** The '822 patent is valid and enforceable.

**136.** Metrologic owns the entire right, title, and interest to the '822 patent.

**137.** Zebra has directly infringed and continues to directly infringe at least claim 1 of the '822 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '822 patent, including, for example, Zebra's Matrox Iris GTR smart camera and accessories for the Matrox Iris GTR smart camera including at least the Matrox Imaging software, including MIL-X, MIL-Lite-X and the Matrox Imaging Library X software development kit (“the '822 Patent Accused Products”) and the ET80 and ET85 tablets (“the '822 Patent Accused Tablet Products”).

**138.** As shown below, the '822 Patent Accused Products make up an image capture and processing system.

**139.** The Matrox website (<https://www.matrox.com/en/imaging>) states that “Matrox Imaging is the machine vision industry’s most trusted supplier of vision software, smart cameras, 3D sensors, vision controllers, I/O cards, and frame grabbers. For more than 40 years, we have developed products with assured quality and longevity, applying trusted industry standards. Our products are backed by meticulous in-house design expertise and come with dedicated customer support; this ranges from professional services to support project feasibility, implementation, testing, and continuous improvement, to on-demand or on-premises training for our software products.”



Software



Systems



Components

**140.** The development features page

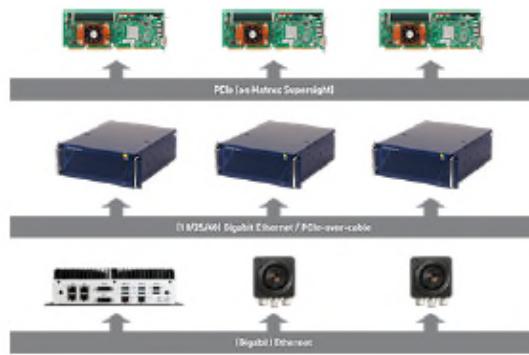
(<https://www.matrox.com/en/imaging/products/software/sdk/mil/development-features>)

describes “Application deployment” as “MIL X offers a flexible licensing model for application deployment. Only the components required to run the application need to be licensed. License fulfillment is achieved using a pre-programmed dongle or an activation code tied to Matrox Imaging hardware (i.e., smart camera, vision controller, I/O card, frame grabber, or dongle). Some components are pre-licensed with certain Matrox Imaging hardware; please consult the individual Matrox Imaging hardware datasheets for details. The use of Distributed MIL X within the same physical system does not require the additional specific license. The installation of MIL X for redistribution can even be hidden from the end user.”

**141.** The '822 Patent Accused Products include an image information and detection subsystem. For example, the Matrox website (<https://www.matrox.com/en/imaging>) states that “Matrox Imaging is the machine vision industry’s most trusted supplier of vision software, smart cameras, 3D sensors, vision controllers, I/O cards, and frame grabbers. For more than 40 years, we have developed products with assured quality and longevity, applying trusted industry standards. Our products are backed by meticulous in-house design expertise and come with dedicated customer support; this ranges from professional services to support project feasibility, implementation, testing, and continuous improvement, to on-demand or on-premises training for our software products.”

**142.** The '822 Patent Accused Products include an image capturing subsystem for capturing images detected by said image formation and detection subsystem. For example, the Matrox website (<https://www.matrox.com/en/imaging>) states that “Matrox Imaging is the machine vision industry’s most trusted supplier of vision software, smart cameras, 3D sensors, vision controllers, I/O cards, and frame grabbers. For more than 40 years, we have developed products with assured quality and longevity, applying trusted industry standards. Our products are backed by meticulous in-house design expertise and come with dedicated customer support; this ranges from professional services to support project feasibility, implementation, testing, and continuous improvement, to on-demand or on-premises training for our software products.”

**143.** In addition, the Distributed MIL X Interface page (<https://www.matrox.com/en/imaging/products/software/sdk/mil/tools/distributed-mil>) shows that “MIL X can easily and efficiently be distributed across HPC clusters and multiple PC/smart camera installations”:



**MIL X can easily and efficiently be distributed across HPC clusters and multiple PC/smart camera installations**

**144.** The '822 Patent Accused Products include an image processing subsystem for processing images captured by said image capturing subsystem. For example, the Software Development Kit Matrox Imaging Library X page states that “The software development kit (SDK) features interactive software and programming functions for image capture, processing, analysis, annotation, display, and archiving. These tools are designed to enhance productivity, thereby reducing the time and effort required to bring solutions to market.”

**145.** Moreover, the Systems page (<https://www.matrox.com/en/imaging/products/systems>) states that the Matrox Iris GTX is a “Smart camera with IP67-rated design, fast high-resolution image sensing, efficient embedded processing, comprehensive I/O capabilities, and paired with flowchart-based Matrox Design Assistant X software for an effective all-in-one vision system.”

**146.** The '822 Patent Accused Products include a processing device. For example, the Software Development Kit Matrox Imaging Library X page states that “The software development kit (SDK) features interactive software and programming functions for image capture, processing, analysis, annotation, display, and archiving. These tools are designed to enhance productivity, thereby reducing the time and effort required to bring solutions to market.”

**147.** Moreover, the development features page (<https://www.matrox.com/en/imaging/products/software/sdk/mil/development-features>) describes “Application deployment” as “MIL X offers a flexible licensing model for application deployment. Only the components required to run the application need to be licensed. License fulfillment is achieved using a pre-programmed dongle or an activation code tied to Matrox Imaging hardware (i.e., smart camera, vision controller, I/O card, frame grabber, or dongle). Some components are pre-licensed with certain Matrox Imaging hardware; please consult the individual

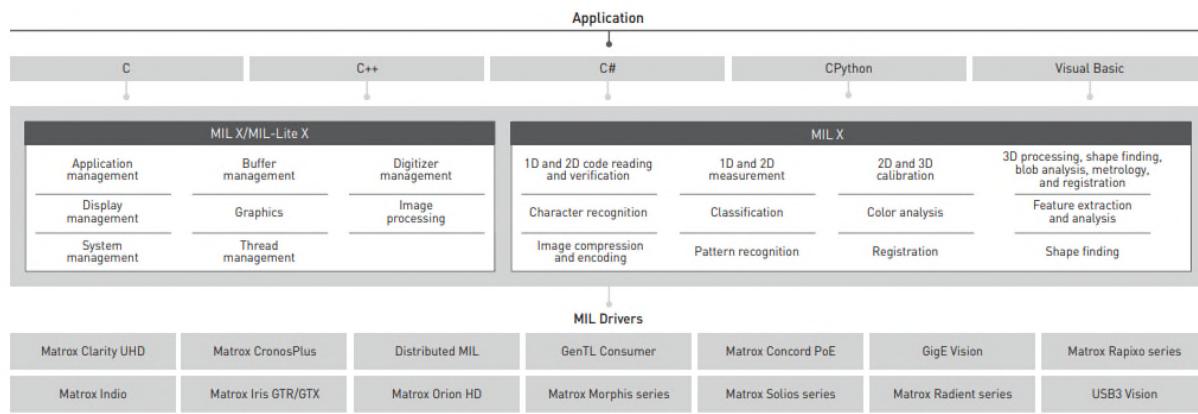
Matrox Imaging hardware datasheets for details. The use of Distributed MIL X within the same physical system does not require the additional specific license. The installation of MIL X for redistribution can even be hidden from the end user.”

**148.** The Systems Smart Cameras Matrox Iris GTX page (<https://www.matrox.com/en/imaging/products/systems/smart-cameras/iris-gtx#smart-cameras>) states that “An Intel® Atom® x6000 series embedded processor allows the use of higher-resolution image sensors that together deliver new levels of performance to the Matrox Iris GTX. The efficient processor enables the Matrox Iris GTX smart cameras to handle both traditional machine vision workloads as well as deep learning inference. These smart cameras also offer real-time digital I/Os for interfacing directly to automation devices. They provide GigE and USB ports, and a VGA video output to enable full integration within an automation cell or machine.”

**149.** The '822 Patent Accused Products include memory comprising processing instructions that, when executed by said processing device, execute an application for reading indicia within said processed images. For example, the Matrox Imaging Library (MIL) Tools page states that “MIL X offers Code Reader, a fast and dependable tool for locating and reading 1D, 2D, and composite identification marks. The tool handles rotated, scaled, and degraded codes in tough lighting conditions. It simultaneously reads multiple 1D or DataMatrix codes as well as small codes found in complex scenes. It can automatically determine a 1D code type and the optimal settings from a training set. The tool can return the orientation, position, and size of a code. In addition to reading, the tool can also be used to verify the quality of a code based on the ANSI/AIM and ISO/IEC grading standards in conjunction with the proper hardware setup.”

**150.** Moreover, the Matrox Imaging Library (MIL) Development features page (<https://www.matrox.com/en/imaging/products/software/sdk/mil/development-features>) shows the following system architecture:

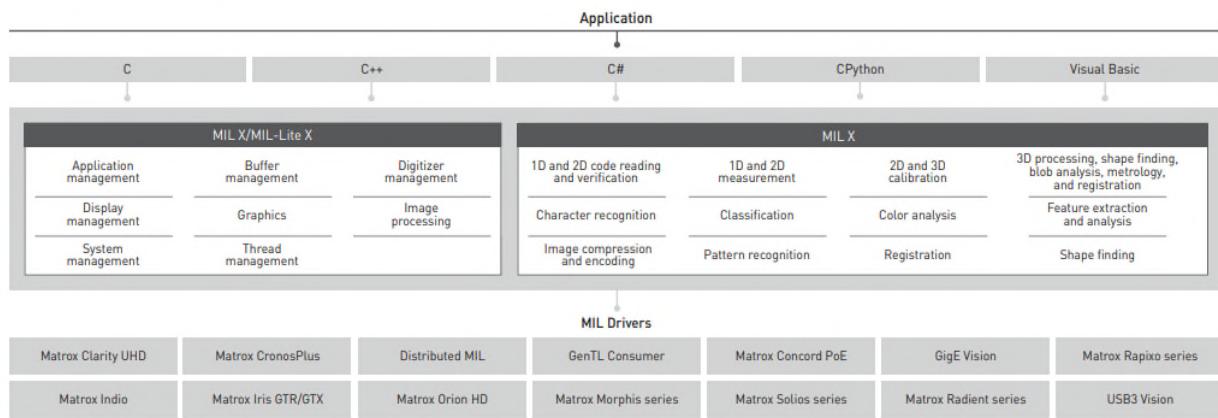
### Software architecture



**151.** In the '822 Patent Accused Products, the memory comprises a memory architecture that supports a multi-tier modular software architecture characterized by an operating system (OS) layer and an application layer in which said application for reading indicia is run.

**152.** The Matrox Imaging Library (MIL) Development features page (<https://www.matrox.com/en/imaging/products/software/sdk/mil/development-features>) shows the following system architecture:

## Software architecture



MIL X provides a comprehensive set of application programming interfaces, imaging tools, and hardware support

**153.** In addition, the Matrox Imaging Library (MIL) Development features page (<https://www.matrox.com/en/imaging/products/software/sdk/mil/development-features>) also states for a “Portable API” that “The MIL X C/C++ API is not only intuitive and straightforward to use but it is also portable. It allows applications to be easily moved from one supported video interface or operating system to another, providing platform flexibility and protecting the original development investment” and for “Complete application development environment” that “In addition to image processing, analysis, and archiving tools, MIL X includes image capture, annotation, and display functions, which form a cohesive API. The API and accompanying utilities are recognized by the large installed base of users for facilitating and accelerating application development.”

**154.** For example, the Software Development Kit Matrox Imaging Library X page (<https://www.matrox.com/en/imaging/products/software/sdk/mil>) states that “Matrox Professional Services delivers deep technical assistance and customized trainings to help customers develop their particular applications. These professional services comprise personalized training; assessing application or project feasibility (e.g., illumination, image acquisition, and vision algorithms);

demo and prototype applications and projects; troubleshooting, including remote debugging; and video/camera interfacing.”

**155.** In addition, and as shown below, the '822 Patent Accused Tablet Products make up an image capture and processing system.

**156.** For example, the ET80/ET85 have multiple mechanisms for capturing and processing images:

The device supports data capture using an integrated scanner and Windows compatible Zebra Bluetooth and USB scanners.

For information on pairing and scanning using Zebra scanners, go to the Product Reference Guide for your scanner.



**NOTE:** When using 123Scan to configure the ET80/85 on-board scan engine, a mouse is required. 123Scan does not support touch screen use. If using 123Scan on a computer other than your tablet, select scanner model SE4107.

### **Imaging**

The device with an integrated 2D imager has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, PDF417, Digimarc, and 2D matrix code types.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

The imager uses imaging technology to take a picture of a barcode, stores the resulting image in memory, and executes state-of-the-art software decoding algorithms to extract the barcode data from the image.

### **Digital Camera**

The device with an integrated camera based barcode scanning solution has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, QR, PDF417, and 2D matrix code types.
- Cross-hair reticle for easy point-and-shoot operation.

The solution uses the advanced camera technology to take a digital picture of a barcode, and executes state-of-the-art software decoding algorithms to extract the data from the image.

### **Scanning Considerations**

Typically, scanning is a simple matter of aim, scan, and decode, with a few quick trial efforts to master it. However, consider the following to optimize scanning performance:

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 36.

## Scanning with Internal Imager

To read a barcode, a scan-enabled app is required.

1. Ensure that an app is open on the tablet and a text field is in focus (text cursor in text field).
2. Point the scanner exit window at a barcode.



3. Press and hold the Scan button (1). The aiming pattern turns on to assist in aiming.

4. Ensure the barcode is within the area formed by the aiming pattern. The aiming dot increases visibility in bright lighting conditions.

A beep sounds to indicate the barcode was decoded successfully. When the Internal Scanner is in Pick List mode, the tablet does not decode the barcode until the aiming dot touches the barcode.

Figure 6 Internal Scanner Aiming Pattern

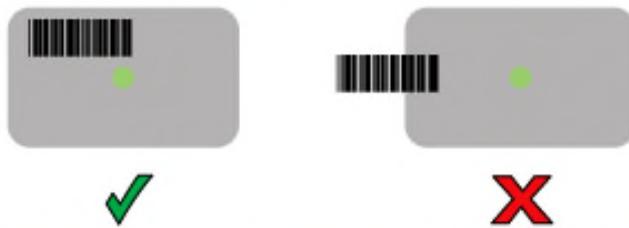


Figure 7 Internal Scanner Pick List Mode with Multiple Barcodes in Aiming Pattern



5. Release the scan button. The captured data appears in the text field.

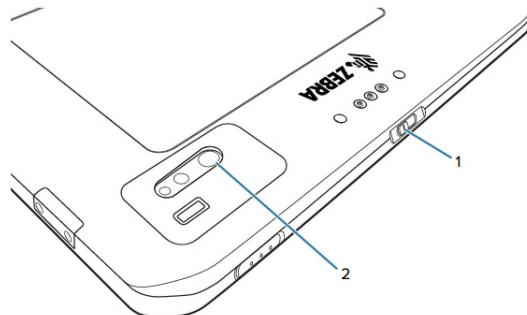
ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, pp. 37-38.

7	Scan button	Initiates barcode data capture when a scan-enabled application is active (programmable).
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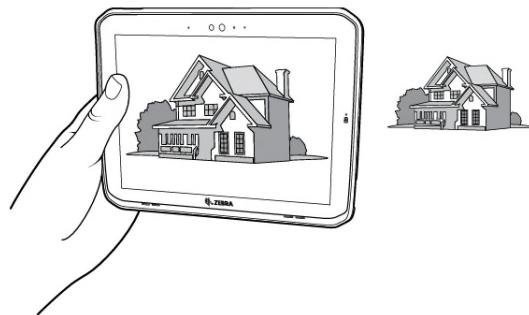
ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 14.

## Using the Camera

1. Ensure the front camera privacy cover (1) or rear camera privacy cover (2) is open.



2. Open the camera application. The Camera Indicator LED illuminates.
3. Point the camera at an object.
4. Touch the on-screen shutter button to take a photo or record a video.



ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 27.

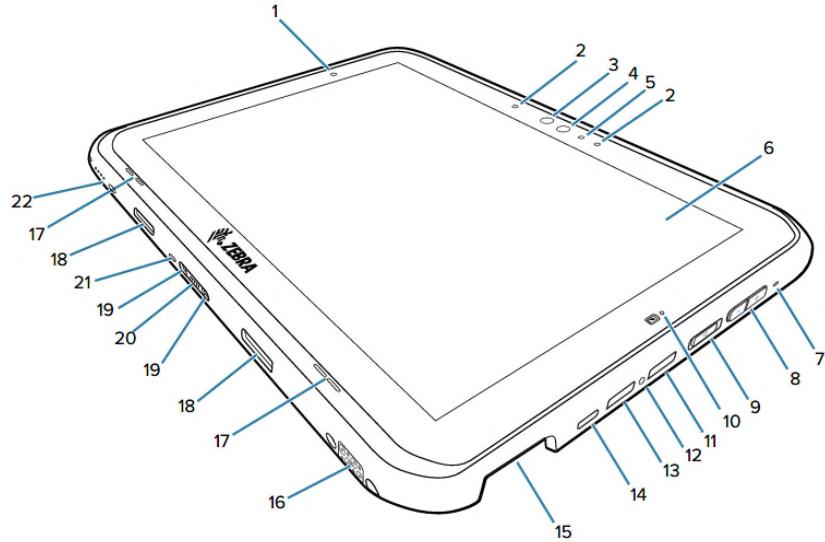
## Data Capture

<b>Scanning</b>
SE4107 2D scanner (available option)
<b>Rear Camera</b>
13 MP auto-focus camera with user controllable LED flash; mechanical privacy shade
<b>Front Camera</b>
FHD Windows Hello auto-focus camera; mechanical privacy shade
<b>Video</b>
Intel Gen 12 Gfx with 4 unique display pipes and 8K Intel wireless display External display support: DP 1.2 up to 4096 x 2160 px, 60Hz; dock supports (2) HDMI 1080p displays

## ET80/ET85 Rugged 2-in1 Tablet Spec Sheet.

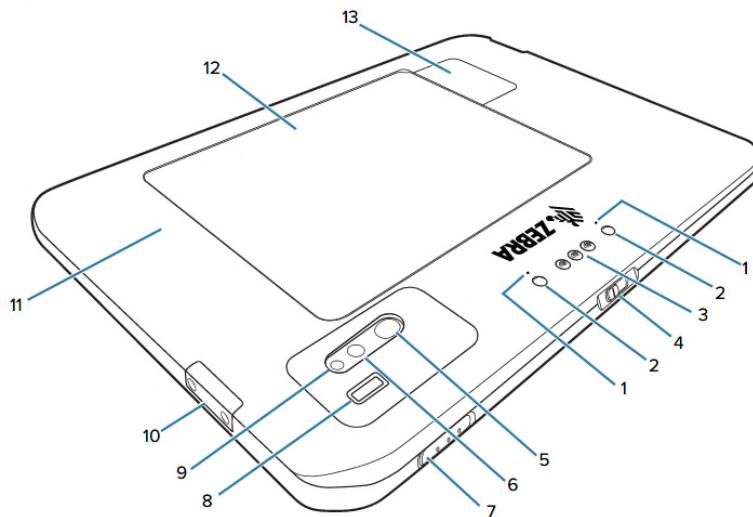
**157.** The '822 Patent Accused Tablet Products include an image formation and detection subsystem. For example, the ET80/ET85 includes camera and other image forming optics as well as camera circuitry and an integrated 2d imager for detection:

**Figure 1** Front View



1	Light sensor	Determines ambient light for controlling display backlight intensity.
2	Front microphones	Use for voice communications or audio recordings.
3	Windows Hello Infrared Illuminator	Illuminates your face with infrared (IR) light during Windows Hello face authentication.
4	Front camera	Use for video conferencing.
5	Camera indicator LED	Illuminates when the camera is activated. Momentarily lights white when the device boots.
6	Touch screen	Displays all information needed to operate the device.
7	Stylus tether mount	Use to attach a stylus tether mount.
8	Volume up/down button	Increases and decreases audio volume.
9	Power button	Turns the display on and off. Press and release to power on the device. Press and hold to reset the device or power off.
10	Charging indicator LED	Indicates power state and battery charging status while charging and application generated notifications.
11	USB-A port	Provides USB host and client communications.
12	Threaded Insert	Use to restrict access to the USB ports in hazardous locations (requires boot).

13	USB-A port	Provides USB host and client communications.
14	USB-C port	Provides USB host and client communications, and device charging via cables and accessories.
15	Scanner window	Provides data capture using the imager.
16	Dock interface connector	Provides communication to the device from the dock.
17	Speakers	Provides audio output.
18	Keyboard latch slot	Attaches the keyboard to the tablet.
19	Keyboard alignment slot	Assists in aligning the tablet with the keyboard.
20	Keyboard interface connector	Provides power and communication with the keyboard
21	Kensington security slot	Use with a security cable to lock the tablet to the keyboard.
22	Power interface connector	Provides power to the device through the dock.

**Figure 2** Back View

1	Rear microphones	Use for audio recordings.
2	Dock alignment slot	Assists in aligning the tablet with the dock.
3	Pass-through antenna	Use to connect to an external antenna.
4	Front camera privacy cover switch	Use to cover the front camera when not in use.
5	Rear camera privacy cover	Use to cover the rear camera when not in use.
6	Rear camera LED flash	Provides illumination for the camera.
7	Scan button	Initiates barcode data capture when a scan-enabled application is active (programmable).
8	Fingerprint sensor	Provides biometric authentication.
9	Rear camera	Autofocus camera that takes photos.

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, pp. 13-14.

## Scanning with Internal Imager

To read a barcode, a scan-enabled app is required.

1. Ensure that an app is open on the tablet and a text field is in focus (text cursor in text field).
2. Point the scanner exit window at a barcode.



3. Press and hold the Scan button (1). The aiming pattern turns on to assist in aiming.

4. Ensure the barcode is within the area formed by the aiming pattern. The aiming dot increases visibility in bright lighting conditions.

A beep sounds to indicate the barcode was decoded successfully. When the Internal Scanner is in Pick List mode, the tablet does not decode the barcode until the aiming dot touches the barcode.

Figure 6 Internal Scanner Aiming Pattern

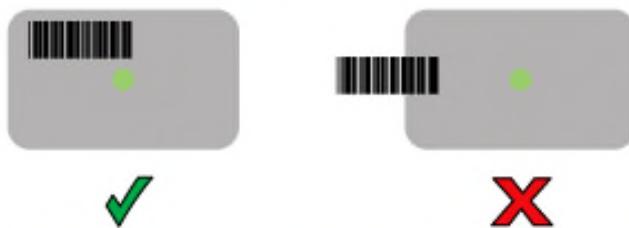
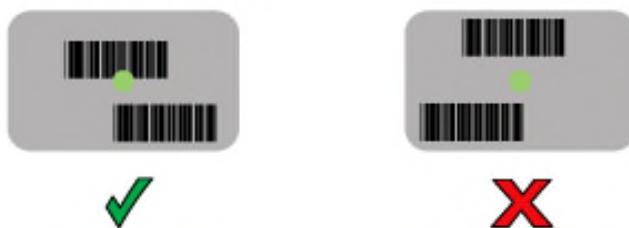


Figure 7 Internal Scanner Pick List Mode with Multiple Barcodes in Aiming Pattern



5. Release the scan button. The captured data appears in the text field.

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 37-38.

7	Scan button	Initiates barcode data capture when a scan-enabled application is active (programmable).
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ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 14.

The device supports data capture using an integrated scanner and Windows compatible Zebra Bluetooth and USB scanners.

For information on pairing and scanning using Zebra scanners, go to the Product Reference Guide for your scanner.



**NOTE:** When using 123Scan to configure the ET80/85 on-board scan engine, a mouse is required. 123Scan does not support touch screen use. If using 123Scan on a computer other than your tablet, select scanner model SE4107.

## Imaging

The device with an integrated 2D imager has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, PDF417, Digimarc, and 2D matrix code types.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

The imager uses imaging technology to take a picture of a barcode, stores the resulting image in memory, and executes state-of-the-art software decoding algorithms to extract the barcode data from the image.

## Digital Camera

The device with an integrated camera based barcode scanning solution has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, QR, PDF417, and 2D matrix code types.
- Cross-hair reticle for easy point-and-shoot operation.

The solution uses the advanced camera technology to take a digital picture of a barcode, and executes state-of-the-art software decoding algorithms to extract the data from the image.

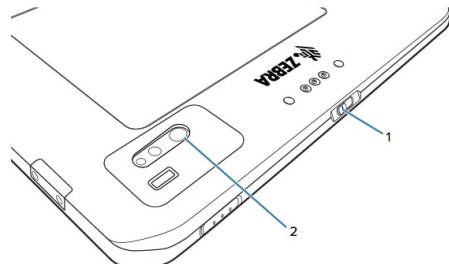
## Scanning Considerations

Typically, scanning is a simple matter of aim, scan, and decode, with a few quick trial efforts to master it. However, consider the following to optimize scanning performance:

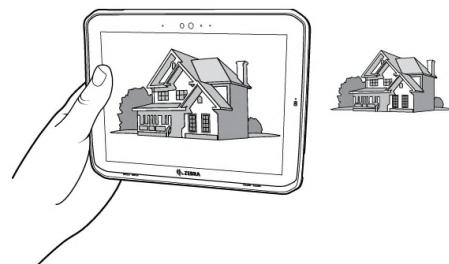
ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 36.

## Using the Camera

1. Ensure the front camera privacy cover (1) or rear camera privacy cover (2) is open.



2. Open the camera application. The Camera Indicator LED illuminates.
3. Point the camera at an object.
4. Touch the on-screen shutter button to take a photo or record a video.



ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 27.

**158.** The '822 Patent Accused Tablet Products include an image capturing subsystem for capturing images detected by said image formation and detection subsystem. For example, the ET80/ET85 includes camera circuitry and an integrated 2d imager for capturing the detected images e.g., taken by the camera or scanned in by the imager:

### **Scanning with Internal Imager**

To read a barcode, a scan-enabled app is required.

1. Ensure that an app is open on the tablet and a text field is in focus (text cursor in text field).
2. Point the scanner exit window at a barcode.

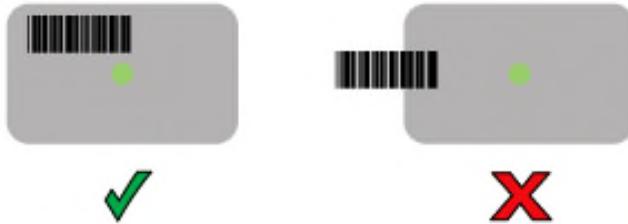


3. Press and hold the Scan button (1). The aiming pattern turns on to assist in aiming.

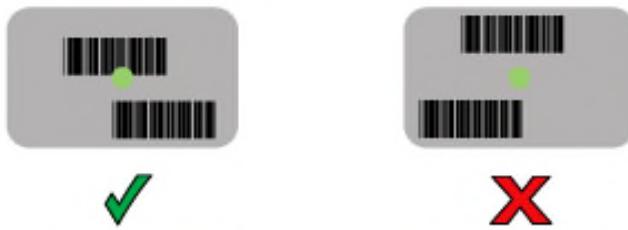
4. Ensure the barcode is within the area formed by the aiming pattern. The aiming dot increases visibility in bright lighting conditions.

A beep sounds to indicate the barcode was decoded successfully. When the Internal Scanner is in Pick List mode, the tablet does not decode the barcode until the aiming dot touches the barcode.

**Figure 6 Internal Scanner Aiming Pattern**



**Figure 7 Internal Scanner Pick List Mode with Multiple Barcodes in Aiming Pattern**



5. Release the scan button. The captured data appears in the text field.

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, pp.

7	Scan button	Initiates barcode data capture when a scan-enabled application is active (programmable).
---	-------------	------------------------------------------------------------------------------------------

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 14.

The device supports data capture using an integrated scanner and Windows compatible Zebra Bluetooth and USB scanners.

For information on pairing and scanning using Zebra scanners, go to the Product Reference Guide for your scanner.



**NOTE:** When using 123Scan to configure the ET80/85 on-board scan engine, a mouse is required. 123Scan does not support touch screen use. If using 123Scan on a computer other than your tablet, select scanner model SE4107.

## Imaging

The device with an integrated 2D imager has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, PDF417, Digimarc, and 2D matrix code types.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

The imager uses imaging technology to take a picture of a barcode, stores the resulting image in memory, and executes state-of-the-art software decoding algorithms to extract the barcode data from the image.

## Digital Camera

The device with an integrated camera based barcode scanning solution has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, QR, PDF417, and 2D matrix code types.
- Cross-hair reticle for easy point-and-shoot operation.

The solution uses the advanced camera technology to take a digital picture of a barcode, and executes state-of-the-art software decoding algorithms to extract the data from the image.

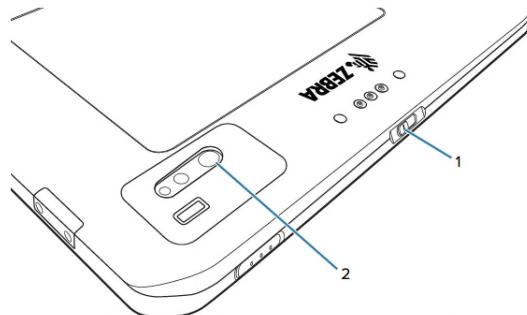
## Scanning Considerations

Typically, scanning is a simple matter of aim, scan, and decode, with a few quick trial efforts to master it. However, consider the following to optimize scanning performance:

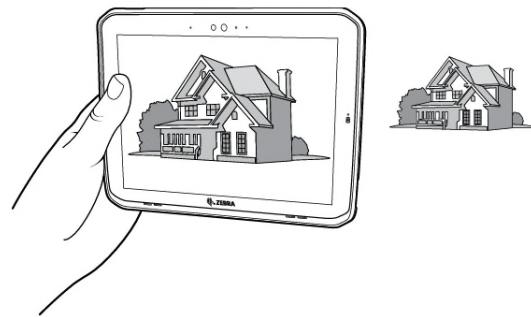
ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 36.

## Using the Camera

1. Ensure the front camera privacy cover (1) or rear camera privacy cover (2) is open.



2. Open the camera application. The Camera Indicator LED illuminates.
3. Point the camera at an object.
4. Touch the on-screen shutter button to take a photo or record a video.



ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 27.

### Scanner configuration and data integration made easy

Automatically detect and easily configure the scanner in your ET80 and ET85 tablets with 123Scan, an easy to use tool that allows even first time users to get your scanners up and running quickly. And the ability to format barcode data for your application makes it easy to integrate scanning into any workflow, eliminating data entry errors.

ET80/ET85 Rugged 2-in1 Tablet Spec Sheet.

**159.** The '822 Patent Accused Tablet Products include an image processing subsystem for processing images captured by said image capturing subsystem. For example, the ET80/ET85 is described as being capable of processing barcodes “even if they are damaged, scratched or poorly printed”:

#### **World-class data capture**

The best-in-class 13 MP rear color camera with flash captures high resolution images to document just about anything — from vehicle damage resulting from a traffic accident to the condition of a wound to a fallen tree on a power line or a machine on the production line in need of repair.

The optional integrated scanner delivers first-time every-time capture of barcodes, even if they are damaged, scratched or poorly printed. And the scanner is thoughtfully located in the bottom right corner, allowing officers to easily scan driver's licenses when the tablet is docked in the vehicle.

ET80/ET85 Rugged 2-in1 Tablet Spec Sheet.

**160.** The “imaging” and “digital camera” features are also described as performing image processing on images captured by the scanner and camera:

#### **Imaging**

The device with an integrated 2D imager has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, PDF417, Digimarc, and 2D matrix code types.
- Advanced intuitive laser aiming cross-hair and dot aiming for easy point-and-shoot operation.

The imager uses imaging technology to take a picture of a barcode, stores the resulting image in memory, and executes state-of-the-art software decoding algorithms to extract the barcode data from the image.

#### **Digital Camera**

The device with an integrated camera based barcode scanning solution has the following features:

- Omnidirectional reading of a variety of barcode symbologies, including the most popular linear, postal, QR, PDF417, and 2D matrix code types.
- Cross-hair reticle for easy point-and-shoot operation.

The solution uses the advanced camera technology to take a digital picture of a barcode, and executes state-of-the-art software decoding algorithms to extract the data from the image.

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 36.

**161.** The '822 Patent Accused Tablet Products include a processing device. For example, the ET80/ET85 includes an Intel i7 or i5 processor:

### Performance Characteristics

CPU
11th generation Intel® Core™ i7-1180G7 vPro® processor 11th generation Intel® Core™ i5-1140G7 vPro® processor 11th generation Intel® Core™ i5-1130G7 processor
Operating System
Windows® 10 Professional 64-bit Windows® 10 IoT Enterprise 64-bit <sup>2</sup>
Memory
8 GB or 16 GB LPDDR4x-4266
Storage
128 GB, 256 GB or 512 GB tool-less user removable PCIe SSD

ET80/ET85 Rugged 2-in1 Tablet Spec Sheet.

**162.** The '822 Patent Accused Tablet Products include includes a memory comprising processing instructions that, when executed by said processing device, execute an application for reading indicia within said processed images. For example, the ET80/ET85 includes 8 GB or 16 GB LPDDR4x-4266 memory, which upon information and belief is used to store instructions used by the processor to execute an application for reading indicia within said processed images:

## Performance Characteristics

CPU
11th generation Intel® Core™ i7-1180G7 vPro® processor 11th generation Intel® Core™ i5-1140G7 vPro® processor 11th generation Intel® Core™ i5-1130G7 processor
Operating System
Windows® 10 Professional 64-bit Windows® 10 IoT Enterprise 64-bit <sup>2</sup>
Memory
8 GB or 16 GB LPDDR4x-4266
Storage
128 GB, 256 GB or 512 GB tool-less user removable PCIe SSD

ET80/ET85 Rugged 2-in1 Tablet Spec Sheet.

**163.** As shown above, the ET80/ET85 includes one of a 128 GB, 256 GB or 512 GB tool-less user removable PCIe SSD, which upon information and belief is used to store applications and or instructions used by the processor to execute an application for reading indicia within said processed images.

**164.** The ET80/ET85 allows users to install application on the device, which are stored in one of the ET80/ET85's storage devices (e.g., memory or SSD):

### Zebra Barcode Scanning Resources

To obtain Zebra scanning resources such as applications, SDKs, drivers, and RFID software see the Zebra Barcode Scanning Software web page at:  
[zebra.com/us/en/products/software/scanning-systems.html](http://zebra.com/us/en/products/software/scanning-systems.html).

### Application Installation

Install programs and apps from the Internet, or a local network. Make sure you trust the publisher of the app and the website.

In your web browser, tap or click the link to the app. To install it now, tap **Open** or **Run**, and then follow the instructions on your screen. To install the app later, tap **Save** or **Save as** to download it.

### Getting Apps from the Windows Store

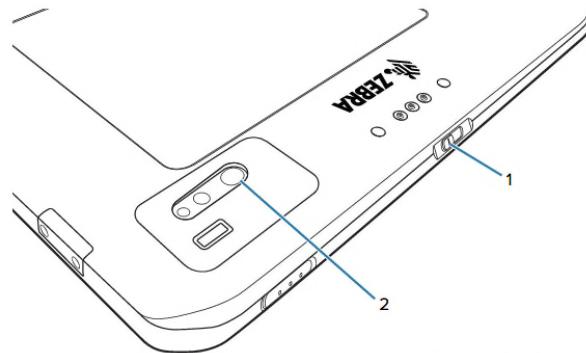
To obtain apps from the Windows Store, select the Store tile  from the Start menu or taskbar.

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 35.

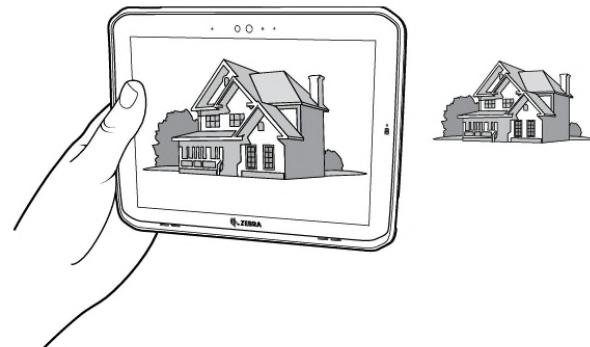
**165.** One example application on the ET80/ET85 is the camera application:

### Using the Camera

1. Ensure the front camera privacy cover (1) or rear camera privacy cover (2) is open.



2. Open the camera application. The Camera Indicator LED illuminates.
3. Point the camera at an object.
4. Touch the on-screen shutter button to take a photo or record a video.



ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 27.

**166.** The memory in the '822 Patent Accused Tablet Products has a memory architecture that supports a multi-tier modular software architecture characterized by an operating system (OS) layer and an application layer in which said application for reading indicia is run.

**167.** For example, the ET80/ET85 operates a Windows® 10 OS:

## Performance Characteristics

CPU
11th generation Intel® Core™ i7-1180G7 vPro® processor 11th generation Intel® Core™ i5-1140G7 vPro® processor 11th generation Intel® Core™ i5-1130G7 processor
Operating System
Windows® 10 Professional 64-bit Windows® 10 IoT Enterprise 64-bit <sup>2</sup>
Memory
8 GB or 16 GB LPDDR4x-4266
Storage
128 GB, 256 GB or 512 GB tool-less user removable PCIe SSD

ET80/ET85 Rugged 2-in1 Tablet Spec Sheet.

**168.** The ET80/ET85 executes applications, including e.g., the camera application for reading barcodes and other indicia, which upon information and belief executes in an application layer:

### Zebra Barcode Scanning Resources

To obtain Zebra scanning resources such as applications, SDKs, drivers, and RFID software see the Zebra Barcode Scanning Software web page at:  
[zebra.com/us/en/products/software/scanning-systems.html](http://zebra.com/us/en/products/software/scanning-systems.html).

### Application Installation

Install programs and apps from the Internet, or a local network. Make sure you trust the publisher of the app and the website.  
 In your web browser, tap or click the link to the app. To install it now, tap **Open** or **Run**, and then follow the instructions on your screen. To install the app later, tap **Save** or **Save as** to download it.

### Getting Apps from the Windows Store

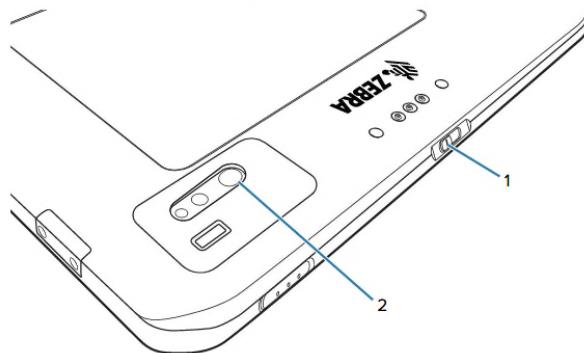
To obtain apps from the Windows Store, select the Store tile  from the Start menu or taskbar.

ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 35.

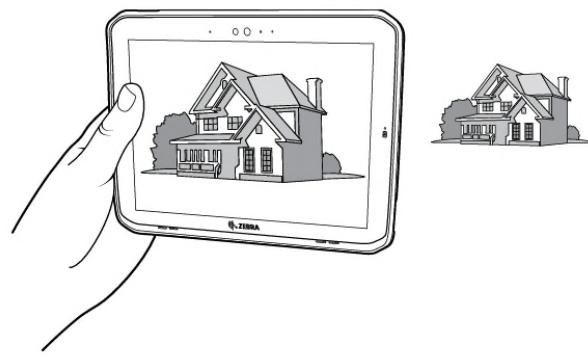
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## Using the Camera

1. Ensure the front camera privacy cover (1) or rear camera privacy cover (2) is open.



2. Open the camera application. The Camera Indicator LED illuminates.
3. Point the camera at an object.
4. Touch the on-screen shutter button to take a photo or record a video.



ET80/ET85 Rugged 2-in1 Tablet Product Reference Guide for Microsoft® Windows® 10, p. 27.

**170.** Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the '822 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**171.** On information and belief, Zebra had knowledge of or was willfully blind to the '822 patent before Honeywell filed this suit. For example, Symbol cited the '822 patent as prior art in at least U.S. Patent No. 9,185,306 and published application US20160125815A1.

**172.** Zebra has induced and continues to induce infringement of the '822 patent by providing information and instruction on using the '822 Patent Accused Products and '822 Patent Accused Tablet Products in an infringing manner evidence at least by: (i) the marketing and sales

materials provided to its customers and potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**173.** Zebra contributes to infringement of the '822 patent by others by manufacturing, marketing, and selling the '822 Patent Accused Products and '822 Patent Accused Tablet Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**174.** Despite its knowledge of the '822 patent, Zebra infringed and continues to infringe the '822 patent. Accordingly, Zebra's infringement was willful.

**175.** As a result of Zebra's infringement of the '822 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**176.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**177.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT III**  
**INFRINGEMENT OF U.S. PATENT NO. 9,342,724**

**178.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

**179.** The '724 patent is valid and enforceable.

**180.** Honeywell International owns the entire right, title, and interest to the '724 patent.

**181.** Zebra has directly infringed and continues to directly infringe at least claim 1 of the '767 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '724 patent, including for example, Zebra's Matrox Iris GTR and appropriate Matrox Iris GTR accessories ("the '724 Patent Accused Products").

**182.** The '724 Patent Accused Products include a barcode scanner comprising the below identified components.

**183.** For example, a 2017 product review (found at <https://www.matrox.com/en/imaging/media/press-releases/matrox-imaging-pack-expo-2017-product-preview>) states that "MONTREAL, Quebec – September 5, 2017—At Pack Expo 2017, Booth S-8152, Matrox® Imaging will demonstrate the reading of packaging information applied using a CIJ printer, as well as barcode reading and label verification, all implemented using the Matrox Design Assistant 5 flowchart-based vision software. The packaging information will be read using the Matrox SureDotOCR™ software tool running on a Matrox Iris GTR smart camera. The barcode reading and label verification will be performed using a Matrox 4Sight GPm vision controller connected to two industrial cameras."

**184.** The '724 Patent Accused Products include a photo detector. For example, photo detectors are included in the CMOS image sensor included in the Matrox Iris GTR: "Matrox Iris GTR is an extremely rugged, IP67-rated smart camera. Measuring just 75mm x 75mm x 54mm, the Iris GTR fits easily into tight and dirty spaces. Powered by CMOS image sensors with high readout rates and an Intel® Celeron® dual-core embedded processor, it capably inspects fast-moving lines and performs more inspections in an allotted time."

(<https://www.matrox.com/en/imaging/media/press-releases/matrox-imaging-pack-expo-2017-product-preview>).

**185.** The '724 Patent Accused Products include a variable focus element situated such that light incident on the photo detector passes through the variable focus element. For example, one accessory for the Matrox Iris GTR is the C-C-39N0-250 (<https://www.matrox.com/en/imaging/products/systems/smart-cameras/iris-gtr/third-party-accessories>):

Third-party Accessories for Matrox Iris GTR	
Supplier	Description
<b>Optics</b>	
Corning Varoptic	C-Series C-39N0-160-I2C: Variable focus 16 mm effective focal length (EFL) liquid lens with I2C control
Corning Varoptic	C-Series C-39N0-250-I2C: Variable focus 25 mm EFL liquid lens with I2C control
<b>Illumination</b>	

**186.** “The C-C-39N0-250 is an electronically focus controllable C-Mount objective, based on the A-39N0 Variable Focus Lens. It incorporates all necessary electronic components to drive the lens, and just needs a DC power supply; focus can be controlled through either an RS232, I<sup>2</sup>C, Analog or SPI input. With a 25 mm EFL, and compatible with 2/3" sensors, it is specifically designed for machine vision applications. It also includes a manual variable iris.” (<https://www.corning.com/worldwide/en/products/advanced-optics/product-materials/corning-varioptic-lenses/auto-focus-lens-modules-c-c-series/varioptic-C-C-39N0-250.html>).

**187.** The '724 Patent Accused Products include a processor coupled to the photo detector to process an image of a barcode captured by the photo detector to at least partially deblur the image. For example, the 2017 product review (<https://www.matrox.com/en/imaging/media/press-releases/matrox-imaging-pack-expo-2017-product-preview>) states that “Matrox Iris GTR is an

extremely rugged, IP67-rated smart camera. Measuring just 75mm x 75mm x 54mm, the Iris GTR fits easily into tight and dirty spaces. Powered by CMOS image sensors with high readout rates and an Intel® Celeron® dual-core embedded processor, it capably inspects fast-moving lines and performs more inspections in an allotted time.”

**188.** The Matrox Design Assistant X Version 1905 User Guide ([https://www.matrox.com/apps/imaging\\_documentation\\_files/dax\\_index.html](https://www.matrox.com/apps/imaging_documentation_files/dax_index.html)) states that “You can remove blur in your images using the filtering operations Shen and Deriche with the IIR operation input set to Sharpen. For filtering, these IIR filters are often more effective than the classic sharpen filtering operations because of newer high resolution image sensors.”

**189.** Moreover, the Matrox Design Assistant X page (<https://integrys.com/product/matrox-design-assistant-x/>) states “Barcode and 2d code reading” may be performed, f“image analysis and processing” is performed and that “Central to Matrox Design Assistant are flowchart steps for calibrating, enhancing, and transforming images, locating objects, extracting and measuring features, reading character strings, and decoding and verifying identification marks. These steps are designed to provide optimum performance and reliability.”

**190.** The Matrox Iris GT with Matrox Design Assistant guide ([https://s.web66.com.tw/\\_file/C13/131966/Dfile/1267502118895file.pdf](https://s.web66.com.tw/_file/C13/131966/Dfile/1267502118895file.pdf)) at 11 indicates that even “degraded codes in tough lighting conditions” can be located and read:

### Image analysis and processing tools (cont.)



**191.** Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the '724 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**192.** On information and belief, Zebra had knowledge of or was willfully blind to the '724 patent before Honeywell filed this suit. For example, Symbol cited the '724 patent as prior art in at least U.S. Patent No. 10,491,790.

**193.** Zebra has induced and continues to induce infringement of the '724 patent by providing information and instruction on using the '724 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at

least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**194.** Zebra contributes to infringement of the '724 patent by others by manufacturing, marketing, and selling the '724 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**195.** Despite its knowledge of the '724 patent, Zebra infringed and continues to infringe the '724 patent. Accordingly, Zebra's infringement was willful.

**196.** As a result of Zebra's infringement of the '724 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**197.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**198.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT IVI**  
**INFRINGEMENT OF U.S. PATENT NO. 9,507,976**

**199.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

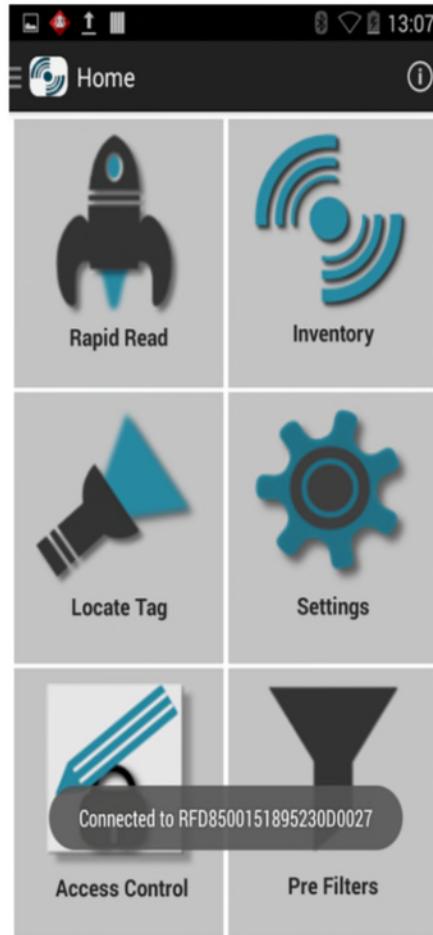
**200.** The '976 patent is valid and enforceable.

**201.** Metrologic owns the entire right, title, and interest to the '976 patent.

**202.** Zebra has directly infringed and continues to directly infringe at least claim 1 of the '976 patent—both literally and under the doctrine of equivalents—by making, using, selling,

and/or offering for sale products that practice and/or embody the inventions disclosed in the '976 patent, including Zebra's Inventory / Locate Tag Graphical User Interface featured in the Zebra RFID Mobile Application for Android (and versions thereof, including at least the 123RFID Mobile Application for Android) used with Zebra's Android mobile computers, or with Zebra's RFID readers coupled with Zebra's Android mobile computers; exemplary infringing products include at least an RFD8500i RFID reader coupled with a TC55 mobile computer, or a TC55 mobile computer running software with the Zebra Inventory / Locate Tag or similar functionality (collectively, "the '976 Patent Accused Products").

**203.** The '976 Patent Accused Products include a communication interface comprising a graphical user interface. For example, the RFD8500i coupled with the TC55, or the TC55 running software with the Zebra Inventory / Locate Tag or similar functionality comprise a graphical user interface associated with the Zebra RFID Mobile Application for Android:

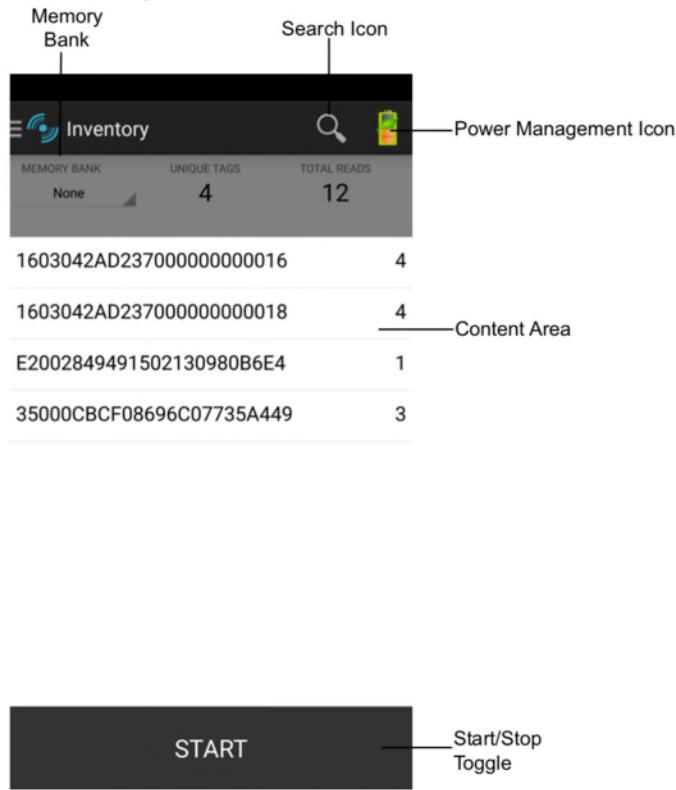


RFD8500i User Guide at 3-3.

**204.** The communication interface in the '976 Patent Accused Products presents an option to a user to allow the user to select an identifier of a radio frequency identification (RFID) tag that is associated with an item, the RFID tag transmitting an encoded representation of a binary string. For example, the Zebra RFID Mobile Application for Android comprises an Inventory and Locate Tag functionality that presents an option for a user to select an RFID tag identifier of an RFID tag associated with an inventory item:

## Inventory

Touch *Inventory* from the *Home* or *Menu* screen.



**Figure 3-8** *Inventory Screen*

RFD8500i User Guide at 3-6.

Content Area (select a tag)	Touching a Tag ID highlights the tag. The highlighted Tag ID is populated on the <i>Tag Location</i> text area as well as the <i>Tag Pattern</i> area in the <i>Access Control</i> screen. Touch <b>START</b> to start searching for the tag. See <a href="#">Locate Tag on page 3-11</a> for more details. From this screen return to the <i>Menu</i> or go to the <i>Home</i> screen and select <i>Locate Tag</i> .
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RFD8500 User Guide at 3-10.

**205.** The communication interface in the '976 Patent Accused Products receives a selection from the user of the RFID tag identifier via the presented option of the graphical user interface. For example, the Zebra RFID Mobile Application for Android comprises an Inventory and Locate Tag functionality receives a selection from the user in the form of touching a Tag ID in the Inventory and/or Locate Tag interface:

Content Area (select a tag)	Touching a Tag ID highlights the tag. The highlighted Tag ID is populated on the <i>Tag Location</i> text area as well as the <i>Tag Pattern</i> area in the <i>Access Control</i> screen. Touch <b>START</b> to start searching for the tag. See <a href="#">Locate Tag on page 3-11</a> for more details. From this screen return to the <i>Menu</i> or go to the <i>Home</i> screen and select <i>Locate Tag</i> .
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RFD8500i User Guide at 3-10.

**206.** The '976 Patent Accused Products comprise an RFID reader that transmits an RF interrogation signal, where the RF interrogation signal is configured to activate the RFID tag corresponding to the identifier if the RFID tag is within range of the RF interrogation signal." For example, the Locate Tag functionality searches for a selected tag identifier by transmitting an RF interrogation signal to activate the corresponding RFID tag when it is in range:

On this screen, enter the *Tag ID* in the text area or select a tag from the *Inventory* screen to pre-populate the *Tag ID* to search.

Touch **START** to start the locate tag operation. Touch **STOP** to stop. The RFD8500i trigger can also be used to start and stop the operation.

 **NOTE** The scan trigger on the RFD8500i can also start and stop the inventory operation. Press the trigger to start, and press again to stop.

The color bar on the display shows the relative distance of the tag.

When the locate tag operation starts, moving to another screen does not stop the operation until Stop is pressed.

RFD8500i User Guide at 3-11.

**207.** The RFID reader in the '976 Patent Accused Products generates a notification indicating the RFID reader received an RFID signal from the RFID tag where at least part of the binary string in the RFID signal is equal to at least part of the selected identifier, thereby indicating that the item associated with the selected identifier is within a range of the RFID reader. For example, the Locate Tag functionality searches for a RFID tag with data, including a binary string, that is equal to all or a part of the selected identifier, and generates a notification to the user:

### Locate Tag

Touch *Locate Tag* from the *Home* or *Menu* screen.



**Figure 3-9** *Locate Tag* Screen

RFD8500i User Guide at 3-11.

**208.** The '976 Patent Accused Products comprise an apparatus responsive to successfully locating said RFID tag, to notify a user of said apparatus via at least one of: a visual message indicative of a distance to said RFID tag and an audible message indicative of a distance to said RFID tag. For example, the Locate Tag functionality displays a visual message such as a color bar indicating distance to the located RFID tag:

### Locate Tag

Touch *Locate Tag* from the *Home* or *Menu* screen.



**Figure 3-9** *Locate Tag* Screen

RFD8500i User Guide at 3-11.

On this screen, enter the *Tag ID* in the text area or select a tag from the *Inventory* screen to pre-populate the *Tag ID* to search.

Touch **START** to start the locate tag operation. Touch **STOP** to stop. The RFD8500i trigger can also be used to start and stop the operation.

✓ **NOTE** The scan trigger on the RFD8500i can also start and stop the inventory operation. Press the trigger to start, and press again to stop.

The color bar on the display shows the relative distance of the tag.

When the locate tag operation starts, moving to another screen does not stop the operation until Stop is pressed.

RFD8500i User Guide at 3-11.

**209.** Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the '976 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**210.** Zebra has induced and continues to induce infringement of the '976 patent by providing information and instruction on using the '976 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**211.** Zebra contributes to infringement of the '976 patent by others by manufacturing, marketing, and selling the '976 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**212.** Despite its knowledge of the '976 patent, Zebra infringed and continues to infringe the '976 patent. Accordingly, Zebra's infringement was willful.

**213.** As a result of Zebra's infringement of the '976 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**214.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**215.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT VII**  
**INFRINGEMENT OF U.S. PATENT NO. 10,134,120**

**216.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

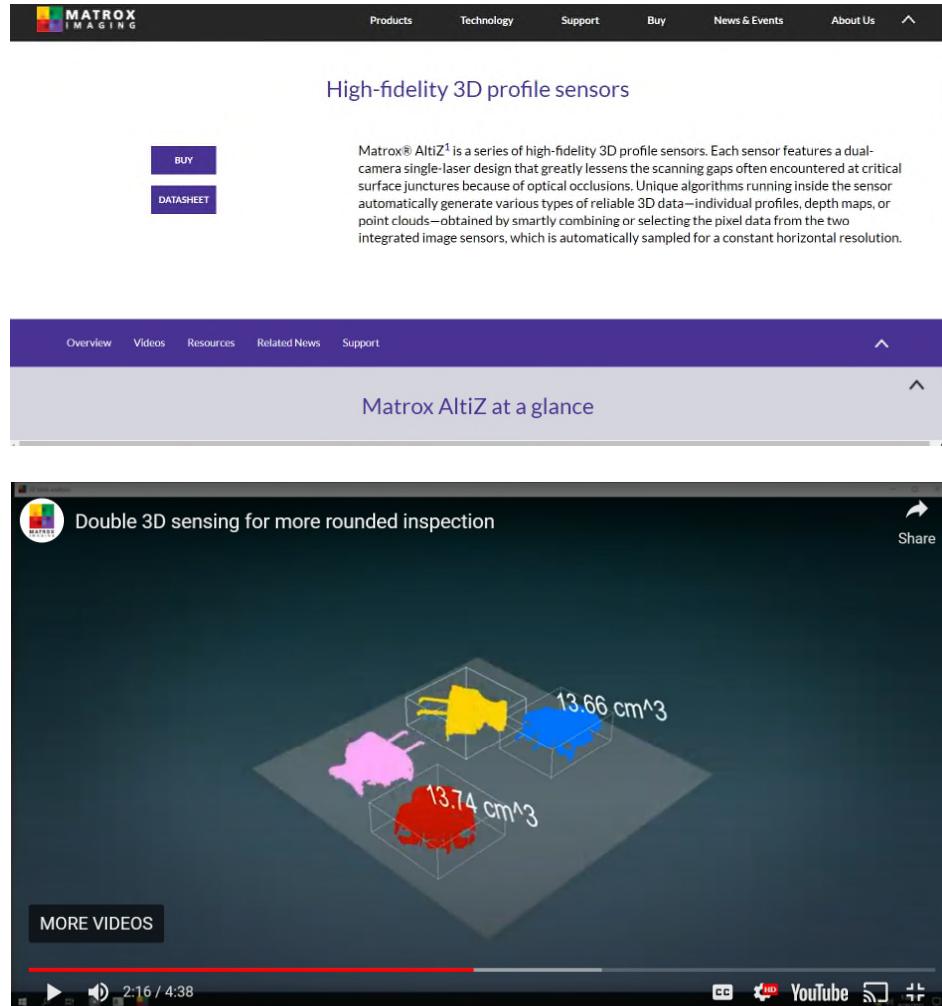
**217.** The '120 patent is valid and enforceable.

**218.** Hand Held owns the entire right, title, and interest to the '120 patent.

**219.** Zebra has directly infringed and continues to directly infringe at least claim 11 of the '120 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '120 patent, including Zebra's 3D profile sensors, including at least Zebra's Matrox Altiz ("the '120 Patent Accused Products").

**220.** The '120 Patent Accused Products are a dimensioning system.

**221.** For example, the Matrox Altiz is a high-fidelity 3D profile sensor that "generates various types of reliable 3D data – individual profiles, depth maps, or point clouds – obtained by smartly combining or selecting the pixel data from the two integrated image sensors, which is automatically sampled for a constant horizontal resolution." This is shown below on Zebra's website located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>, and Zebra's YouTube video located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:



**222.** The '120 Patent Accused Products include a pattern projector configured to project a light pattern onto an object.

**223.** For example, the Matrox AltiZ projects a laser light pattern onto an object being sensed. This is shown below in Zebra's YouTube video located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:



**224.** The '120 Patent Accused Products include a range camera having a field of view and configured to capture an image of a reflected light-pattern in the field of view.

**225.** For example, the Matrox Altiz includes a range camera having a field of view and configured to capture an image of a reflected light pattern in the field of view. This is shown below in Zebra's data sheet located at <https://www.matrox.com/sites/default/files/matrox-altiz.pdf>:

**Overview**

**High-fidelity 3D scanning**  
Matrox® Altiz® is a series of high-fidelity 3D profile sensors. Each sensor features a dual-camera single-laser design that greatly lessens the scanning gaps often encountered at critical surface junctures because of optical occlusions. Unique algorithms running inside the sensor automatically generate various types of reliable 3D data—individual profiles, depth maps, or point clouds—obtained by smartly combining or selecting the pixel data from the two integrated image sensors, which is automatically sampled for a constant horizontal resolution.

**Flexible operation and intuitive setup**  
The two cameras within a Matrox Altiz can operate either synchronously or in alternation. The former provides maximum reproduction quality and robustness; the latter delivers a scanning rate twice that of the former while still providing some defense against occlusion. The scanning volume—affecting the scanning rate—is set in convenient real-world units. An internal object detection mechanism is available to automatically and optimally start and stop scanning to simplify operation by eliminating the need to supply an external trigger to inform of the presence of an object.

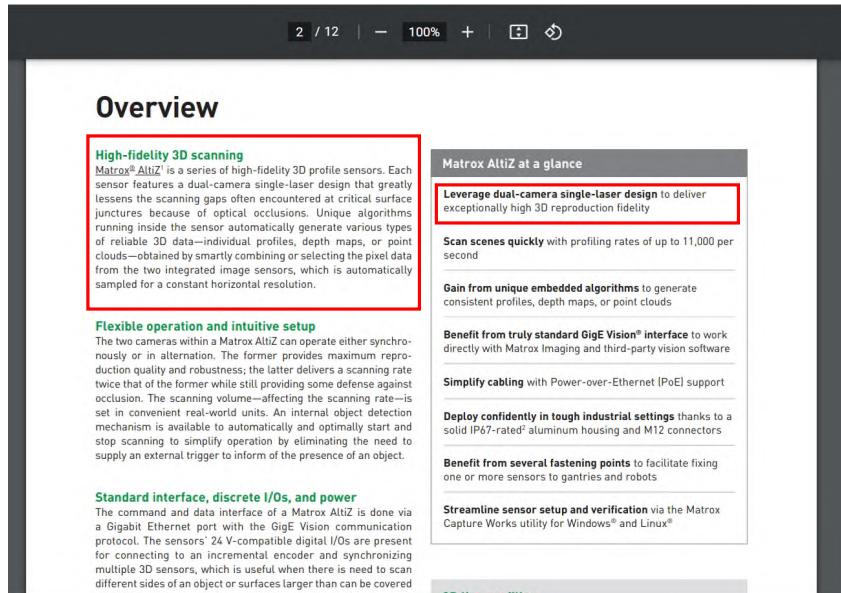
**Standard interface, discrete I/Os, and power**  
The command and data interface of a Matrox Altiz is done via a Gigabit Ethernet port with the GigE Vision communication protocol. The sensors' 24 V-compatible digital I/Os are present for connecting to an incremental encoder and synchronizing multiple 3D sensors, which is useful when there is need to scan different sides of an object or surfaces larger than can be covered.

**Matrox Altiz at a glance**

- Leverage dual-camera single-laser design** to deliver exceptionally high 3D reproduction fidelity
- Scan scenes quickly** with profiling rates of up to 11,000 per second
- Gain from unique embedded algorithms** to generate consistent profiles, depth maps, or point clouds
- Benefit from truly standard GigE Vision® interface** to work directly with Matrox Imaging and third-party vision software
- Simplify cabling** with Power-over-Ethernet (PoE) support
- Deploy confidently in tough industrial settings** thanks to a solid IP67-rated<sup>1</sup> aluminum housing and M12 connectors
- Benefit from several fastening points** to facilitate fixing one or more sensors to gantries and robots
- Streamline sensor setup and verification** via the Matrox Capture Works utility for Windows® and Linux®

**226.** The '120 Patent Accused Products include a range camera configured to generate 3D data from the reflected light-pattern.

**227.** For example, the Matrox Altiz includes a range camera configured to generate 3D data from the reflected light-pattern. This is shown below in Zebra's Altiz data sheet located at <https://www.matrox.com/sites/default/files/matrox-altiz.pdf>:



**228.** The '120 Patent Accused Products include a range camera that create a range image using the 3D data, wherein each pixel of the range image represents a distance from the range camera to a respective point in the range camera's field-of-view.

**229.** For example, the Matrox Altiz includes a range camera that creates depth maps and point clouds obtained by smartly combining the pixel data from the two integrated image sensors. This is shown below in Zebra's Altiz data sheet located at <https://www.matrox.com/sites/default/files/matrox-altiz.pdf>, and Zebra's YouTube video located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:

2 / 12 | - | 100% | + |

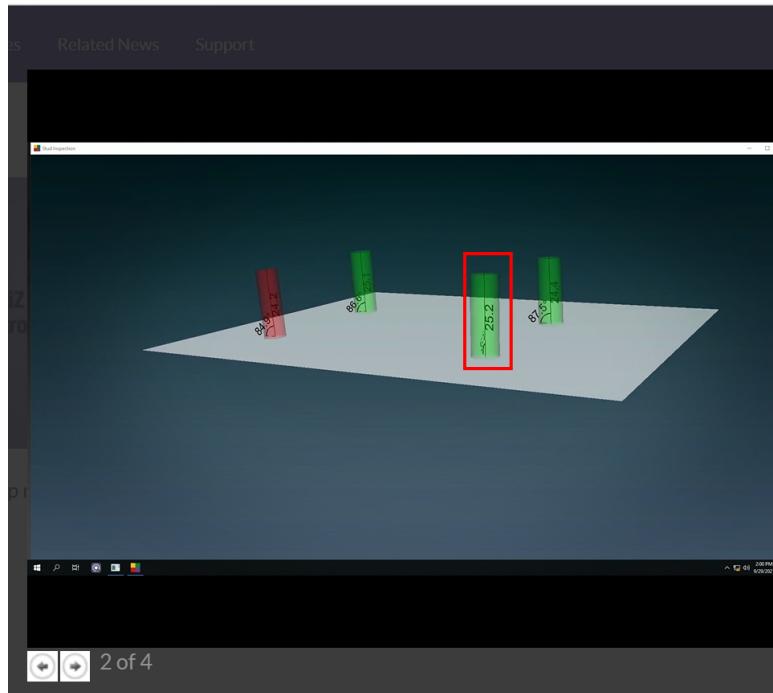
## Overview

**High-fidelity 3D scanning**

Matrox® Altiz® is a series of high-fidelity 3D profile sensors. Each sensor features a dual-camera single-laser design that greatly lessens the scanning gaps often encountered at critical surface junctures because of optical occlusions. Unique algorithms running inside the sensor automatically generate various types of reliable 3D data—individual profiles, depth maps, or point clouds—obtained by smartly combining or selecting the pixel data from the two integrated image sensors, which is automatically sampled for a constant horizontal resolution.

**Matrox Altiz at a glance**

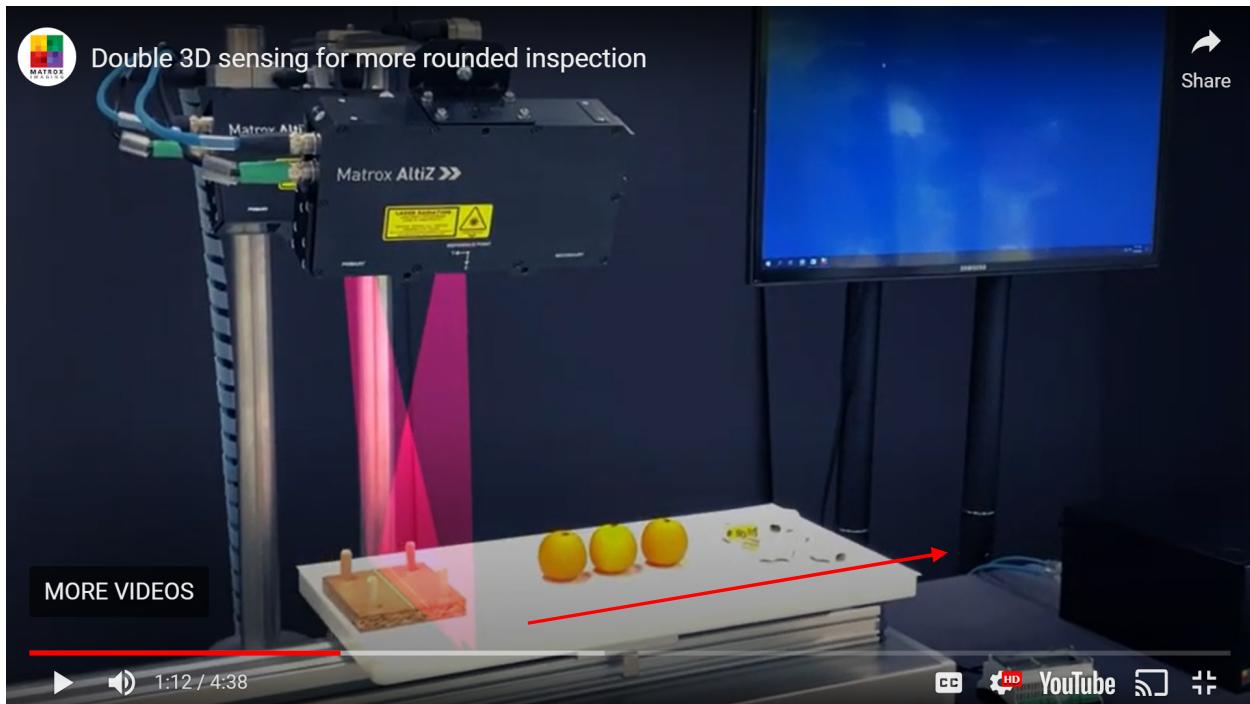
- Leverage dual-camera single-laser design** to deliver exceptionally high 3D reproduction fidelity
- Scan scenes quickly** with profiling rates of up to 11,000 per second
- Gain from unique embedded algorithms** to generate consistent profiles, depth maps, or point clouds
- Benefit from truly standard GigE Vision® interface** to work directly with Matrox Imaging and third-party vision software
- Simplify cabling** with Power-over-Ethernet (PoE) support
- Deploy confidently in tough industrial settings** thanks to a solid IP67-rated<sup>2</sup> aluminum housing and M12 connectors
- Benefit from several fastening points** to facilitate fixing one or more sensors to gantries and robots
- Streamline sensor setup and verification** via the Matrox Capture Works utility for Windows® and Linux®



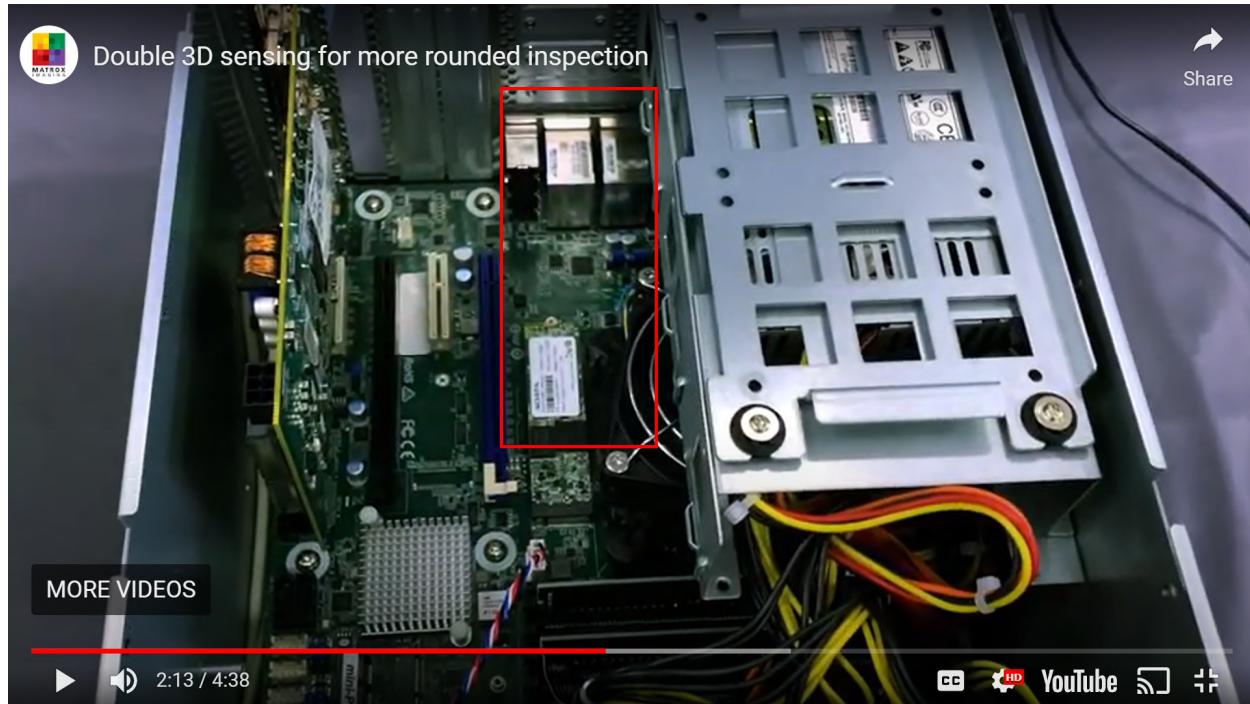
230. The '120 Patent Accused Products include at least one device configured to automatically move the dimensioning system and/or the object so that there is relative movement

between the dimensioning system and the object, and the range camera's field-of-view contains a different portion of the object.

**231.** For example, Zebra's Matrox AltiZ includes a stationary dimensioning system and a moveable platform (shown below moving toward the right) to automatically move the object so there is relative movement between the dimensioning system and the object, and the range camera's field-of-view contains a different portion of the object. This is shown in Zebra's YouTube video located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:

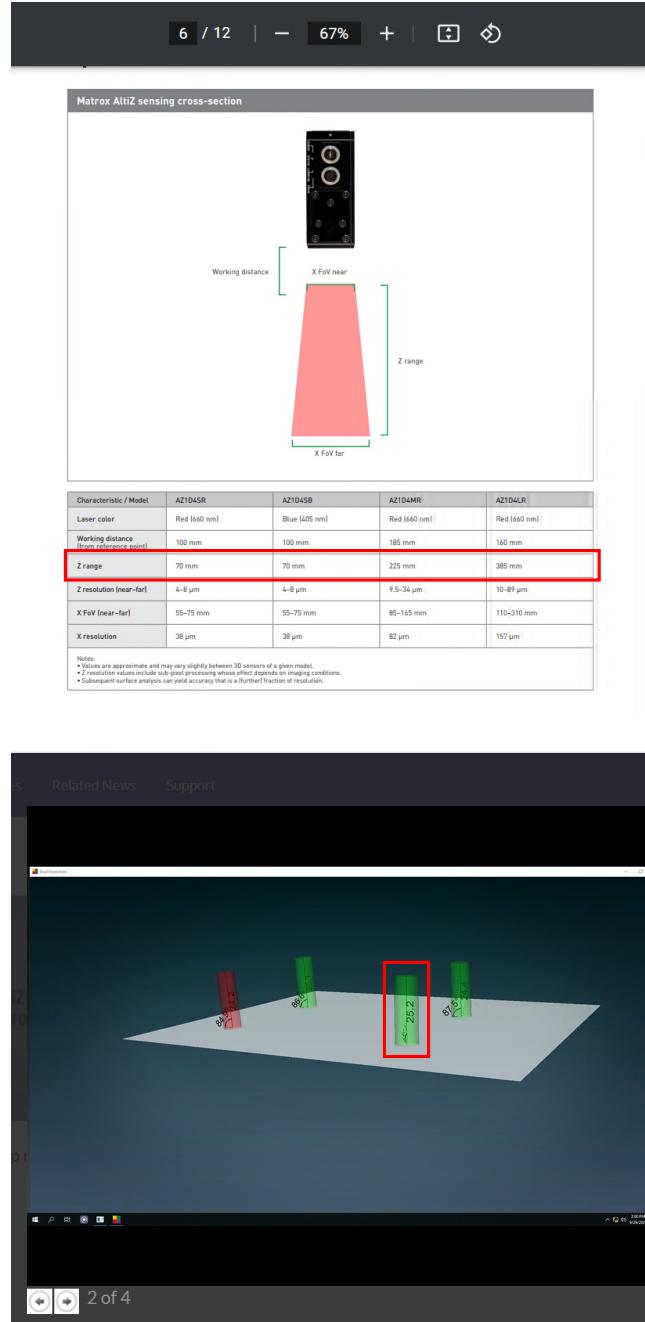


**232.** The '120 Patent Accused Products include a processor communicatively coupled to the pattern projector and the range camera. For example, the Matrox AltiZ includes a processor communicatively coupled to the pattern projector and the range camera. This is shown below in Zebra's YouTube video at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:



**233.** The '120 Patent Accused Products include a processor configured by software to trigger the range camera to capture a plurality of range images, wherein in each range image of the plurality of range images, each pixel of the range image represents a distance from the range camera to a respective point in the range camera's field-of-view.

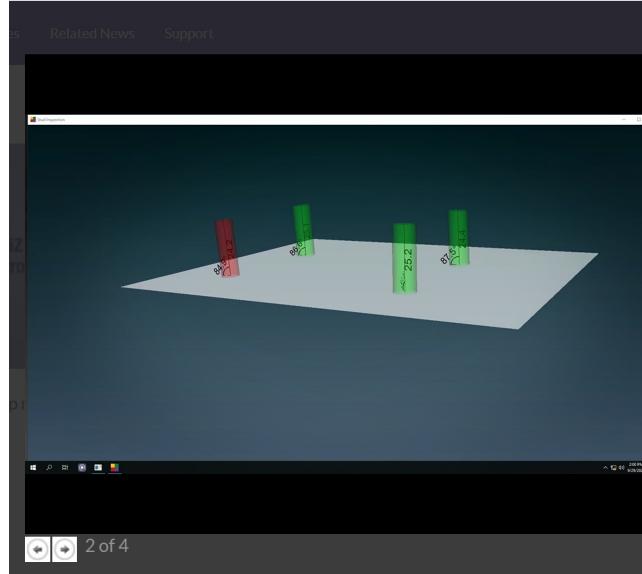
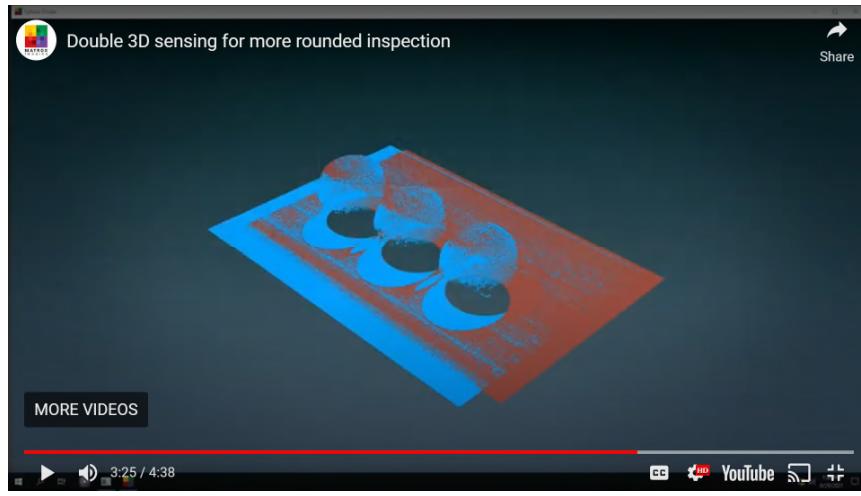
**234.** For example, the Matrox Altiz includes a processor configured by software to trigger the range camera to capture a plurality of range images, wherein in each range image of the plurality of range images, each pixel of the range image represents a distance (within Z range) from the range camera to a respective point in the range camera's field-of-view. This is shown below in Zebra's Matrox Altiz data sheet located at <https://www.matrox.com/sites/default/files/matrox-altiz.pdf>, and Zebra's YouTube video at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:



**235.** The '120 Patent Accused Products include a processor configured by software to combine the plurality of range images into a composite range-image.

**236.** For example, the Matrox Altiz includes a processor configured by software to combine the plurality of range images into a composite range-image. This is shown below in

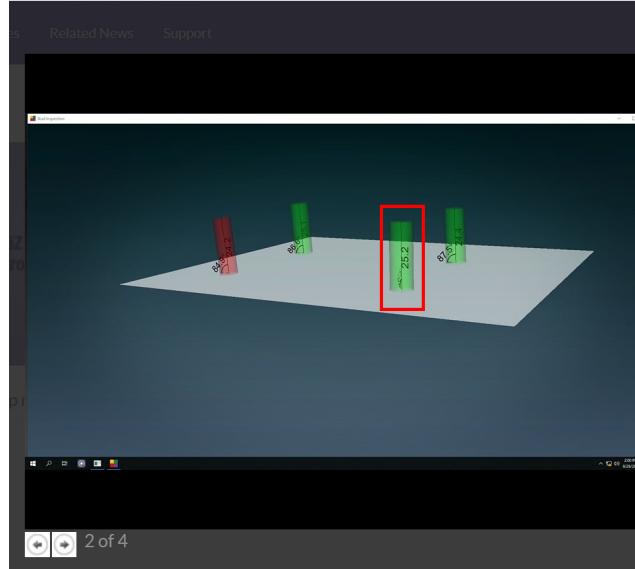
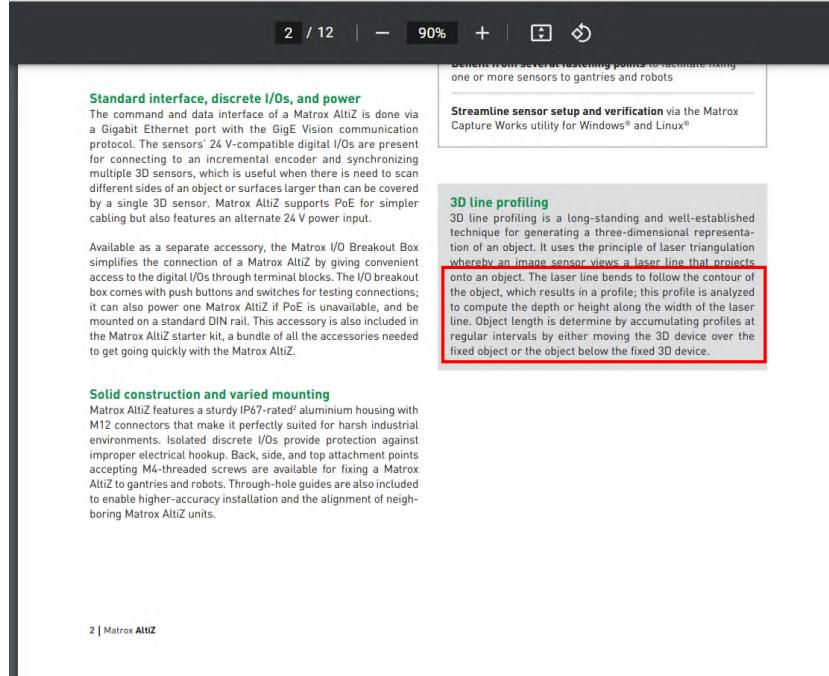
Zebra's YouTube video located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:



**237.** The '120 Patent Accused Products include a processor configured by software to calculate the dimensions of the object using the composite range-image.

**238.** For example, the Matrox Altiz includes a processor configured by software to calculate the dimensions of the object using the composite range-image. This is shown below in Zebra's data sheet located at <https://www.matrox.com/sites/default/files/matrox-altiz.pdf>, and

Zebra's YouTube video located at <https://www.matrox.com/en/imaging/products/systems/3d-sensors/altiz>:



**239.** Zebra also indirectly infringed and continues to indirectly infringe at least claim 11 of the '120 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**240.** Zebra has induced and continues to induce infringement of the '120 patent by providing information and instruction on using the '120 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**241.** Zebra contributes to infringement of the '120 patent by others by manufacturing, marketing, and selling the '120 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**242.** Despite its knowledge of the '120 patent, Zebra infringed and continues to infringe the '120 patent. Accordingly, Zebra's infringement was willful.

**243.** As a result of Zebra's infringement of the '120 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**244.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**245.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

**COUNT VIII**  
**INFRINGEMENT OF U.S. PATENT NO. 6,680,834**

**246.** Honeywell incorporates by reference the allegations contained in all preceding paragraphs.

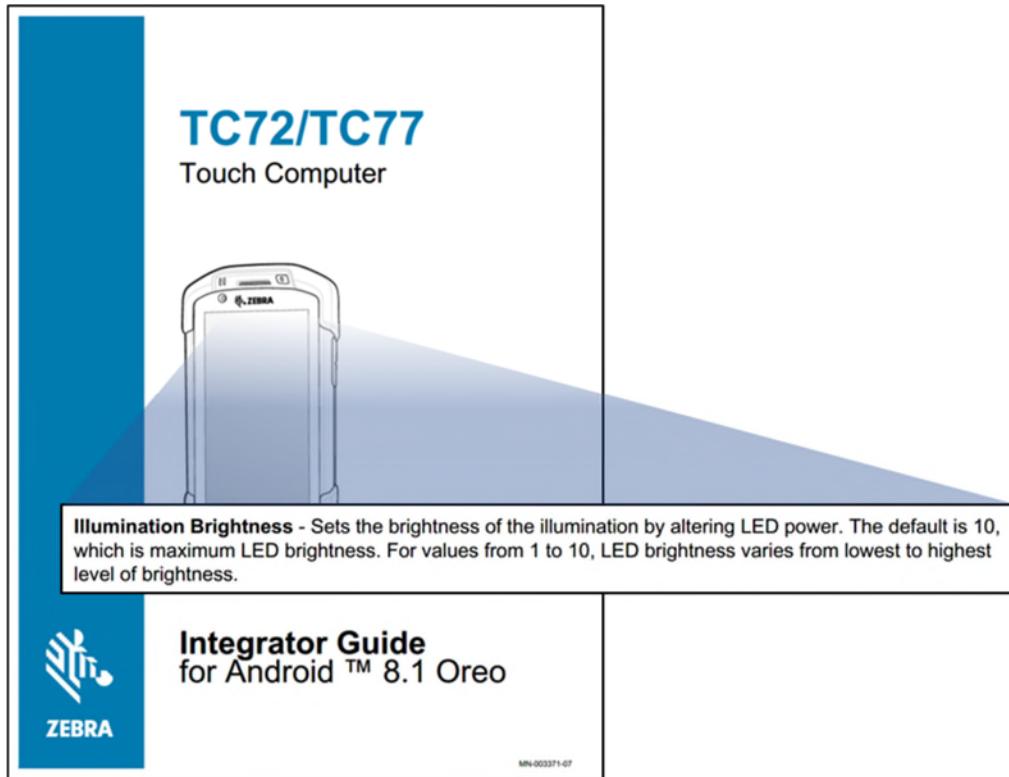
**247.** The '834 patent is valid and enforceable.

**248.** Honeywell International owns the entire right, title, and interest to the '834 patent.

**249.** Zebra has directly infringed and continues to directly infringe at least claim 1 of the '834 patent—both literally and under the doctrine of equivalents—by making, using, selling, and/or offering for sale products that practice and/or embody the inventions disclosed in the '834 patent, including Zebra's TC72 and TC77 mobile devices (“the '834 Patent Accused Products”).

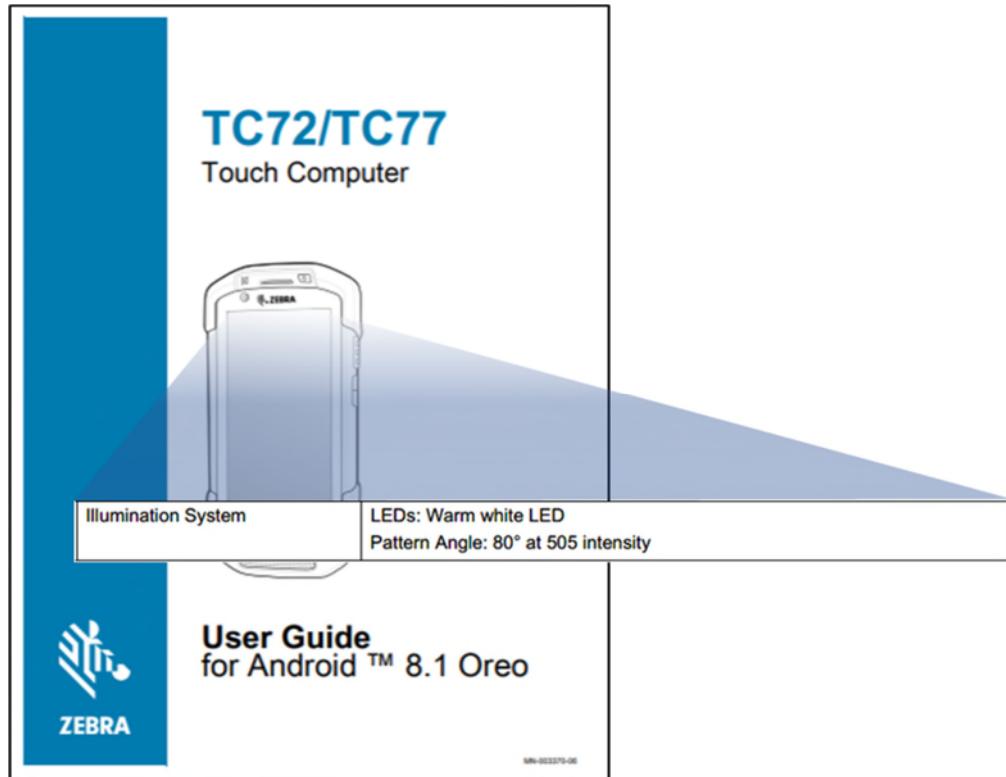
**250.** The '834 Patent Accused Products are apparatuses for controlling the brightness of an LED array.

**251.** For example, the TC72/TC77 Integrator Guide describes how the devices “sets the brightness of the illumination by altering LED power.”



TC72/TC77 Touch Computer Integrator Guide for Android™ 8.1 Oreo, p. 134.

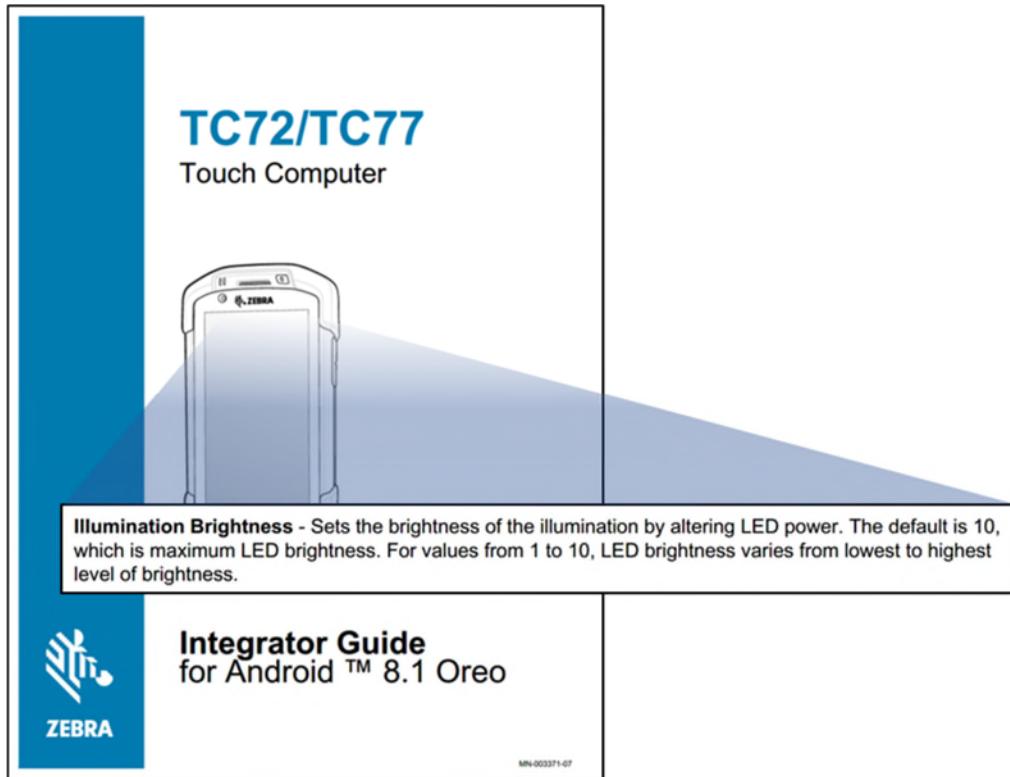
**252.** See also, for example the TC72/TC77 User Guide, which describes the “illumination system” as “LEDs: warm white LED.”



TC72/TC77 Touch Computer User Guide for Android™ 8.1 Oreo, p. 230.

**253.** Upon information and belief, the '834 Patent Accused Products include a current limited limiter disposed between the LED array and a power supply, for limiting an amount of current supplied to the entire LED array.

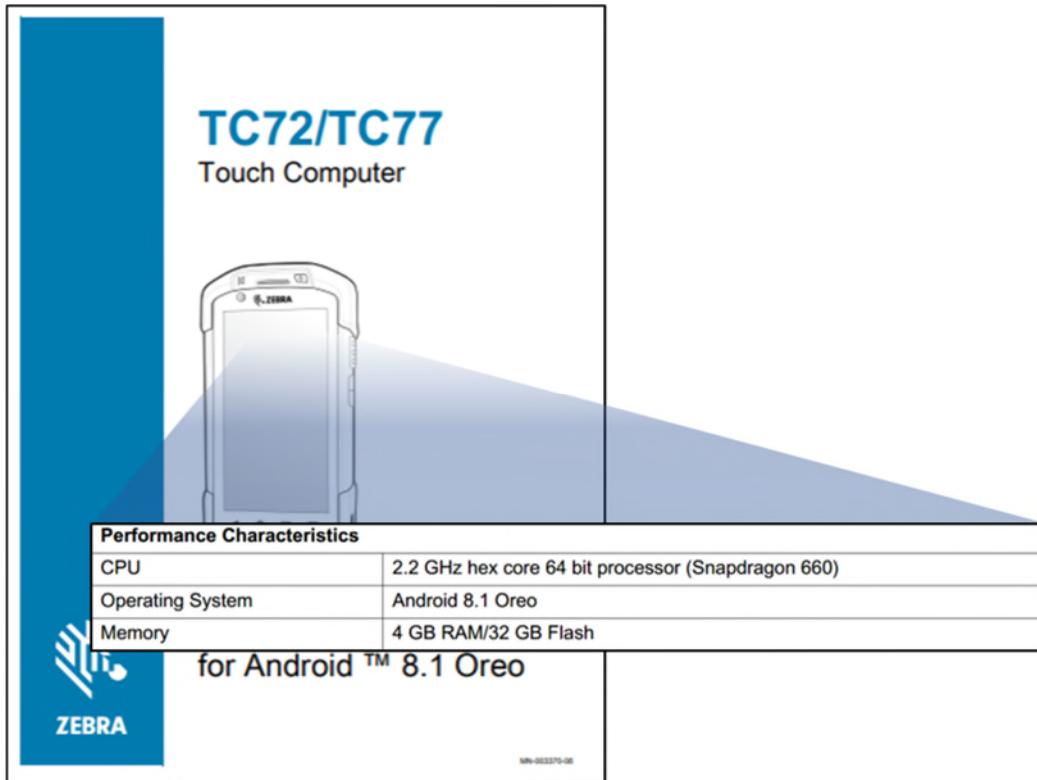
**254.** For example, the TC72/77 Integrator Guide describes how the devices “sets the brightness of the illumination by altering LED power.”



TC72/TC77 Touch Computer Integrator Guide for Android™ 8.1 Oreo, p. 134.

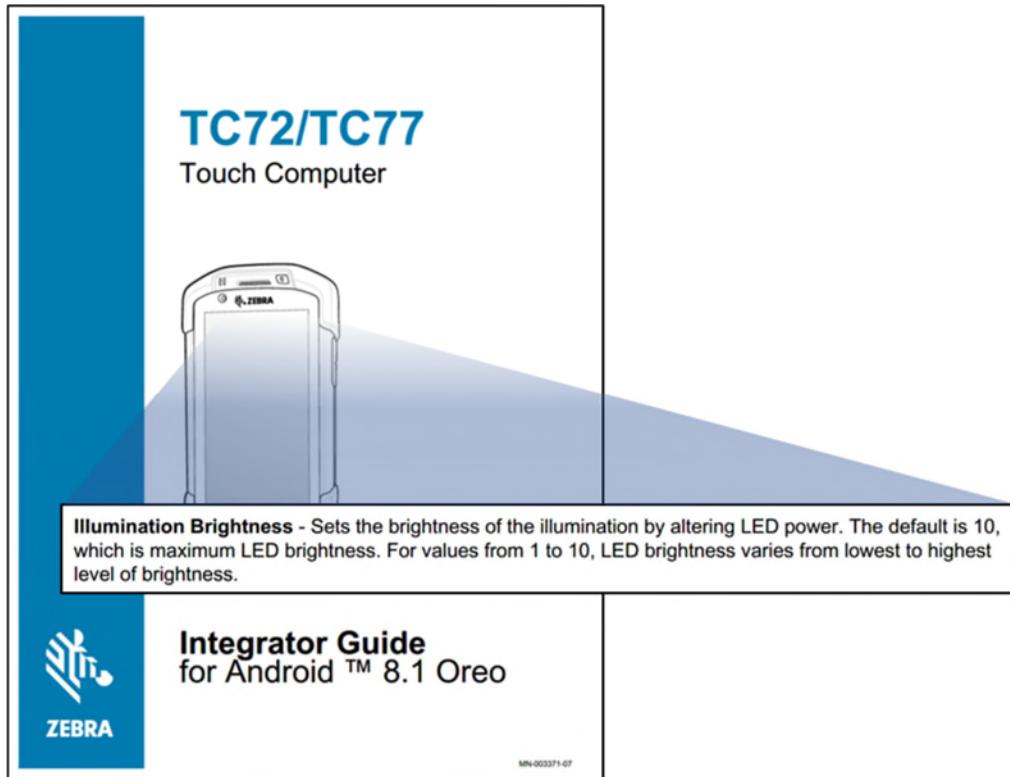
**255.** Upon information and belief, the '834 Patent Accused Products include a controller having an input coupled to receive a plurality of control signals and having an output coupled to the LED array for controlling the brightness of the LED array in accordance with said plurality of control signals.

**256.** For example, the TC72/77 User Guide, which describes the “CPU” as a “2.2Ghz hex core 64 bit processor (Snapdragon 660).”



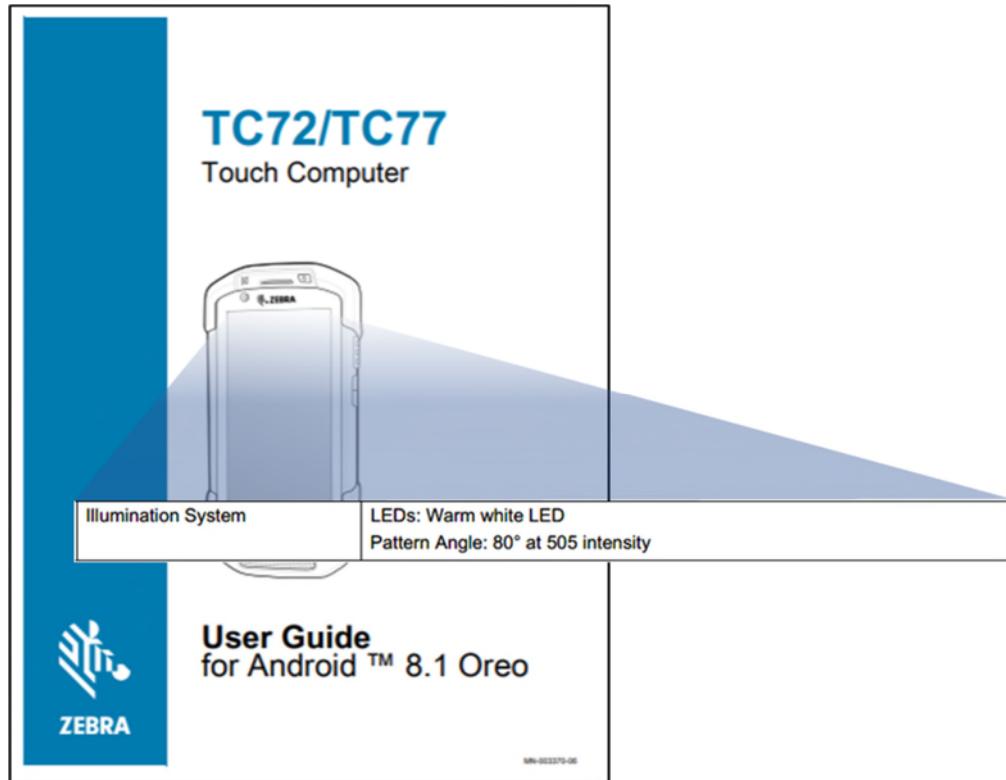
TC72/TC77 Touch Computer User Guide for Android™ 8.1 Oreo, p. 228.

**257.** See also, for example, the TC72/77 Integrator Guide, which describes how the devices “sets the brightness of the illumination by altering LED power.”



TC72/TC77 Touch Computer Integrator Guide for Android™ 8.1 Oreo, p. 134.

**258.** See also, for example the TC72/TC77 User Guide, which describes the “illumination system” as “LEDs: warm white LED.”



TC72/TC77 Touch Computer User Guide for Android™ 8.1 Oreo, p. 230.

**259.** Zebra also indirectly infringed and continues to indirectly infringe at least claim 1 of the '834 patent with knowledge or by being willfully blind that its actions constitute infringement of those claims, at least as of the filing of this Complaint.

**260.** Zebra has induced and continues to induce infringement of the '834 patent by providing information and instruction on using the '834 Patent Accused Products in an infringing manner evidence at least by: (i) the marketing and sales materials provided to its customers and potential customers through its website and its other marketing activities; (ii) the instructions and information contained in Zebra's product guides and instructional materials; and (iii) instructional videos published by Zebra on YouTube. Zebra knew its activities were inducing infringement at least through actively comparing its products to Honeywell's products and copying Honeywell's patented technology.

**261.** Zebra contributes to infringement of the '834 patent by others by manufacturing, marketing, and selling the '834 Patent Accused Products, which are especially made for infringing use, with the knowledge that such use is infringing, and with the knowledge that these products are put to such infringing uses.

**262.** Despite its knowledge of the '834 patent, Zebra infringed and continues to infringe the '834 patent. Accordingly, Zebra's infringement was willful.

**263.** As a result of Zebra's infringement of the '834 patent, Honeywell has suffered and continues to suffer irreparable harm for which it has no adequate remedy at law. Unless enjoined by this Court, Zebra's infringement will continue, resulting in further irreparable harm to Honeywell.

**264.** Honeywell is entitled to recover damages from Zebra not less than a reasonable royalty adequate to compensate for the infringement.

**265.** Zebra's unlawful actions have caused, and will continue to cause, Honeywell irreparable harm to its business and reputation unless enjoined.

#### **JURY DEMAND**

Pursuant to Federal Rule of Civil Procedure 38(b), Honeywell demands a jury trial on all issues so triable.

#### **PRAYER FOR RELIEF**

WHEREFORE, Honeywell respectfully requests this Court enter judgment in Honeywell's favor and grant the following relief:

- A.** Judgment that the Asserted Patents are valid and enforceable, and infringed by Zebra;
- B.** Compensatory damages no less than a reasonable royalty;

- C. Pre- and post-judgement interest on all damages;
- D. Judgment that the damages so adjudged be trebled in accordance with 35 U.S.C. § 284;
- E. Declaring this case exceptional and awarding Honeywell its attorneys' fees and costs, under 35 U.S.C. § 285;
- F. Granting a permanent injunction; and
- G. Granting any other relief as the Court may deem just and proper.

Dated: May 20, 2022

Respectfully submitted,

/s/ John M. Guaragna

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